



WILLIAM T FUJIOKA
Chief Executive Officer

County of Los Angeles CHIEF EXECUTIVE OFFICE

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November 7, 2012

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Dear Supervisors:

**DEPARTMENT OF PUBLIC WORKS:
RANCHO LOS AMIGOS NATIONAL REHABILITATION CENTER
SEISMIC RETROFIT COMPLIANCE AND INPATIENT CONSOLIDATION PROJECT
(CAPITAL PROJECT NO. 69334), CERTIFY THE ADDENDUM TO THE FINAL
ENVIRONMENTAL IMPACT REPORT, APPROVE THE REFINED PROJECT,
ESTABLISH CAPITAL PROJECT NO. 69656 FOR THE NEW OUTPATIENT
FACILITIES, CAPITAL PROJECT NO. 87150 FOR THE SUPPORT SERVICES
ANNEX AND HARRIMAN BUILDING RENOVATIONS PROJECT, AND CAPITAL
PROJECT NO. 69663 FOR THE NORTH CAMPUS INFRASTRUCTURE AND
DEMOLITION PROJECT, AND AWARD AGREEMENTS
(FOURTH DISTRICT) (3 VOTES)**

SUBJECT

Approval of the recommended actions will certify the Addendum for the Rancho Los Amigos National Rehabilitation Center Refined Project and allow the Department of Public Works to proceed with design activities and implement the Rancho Los Amigos National Rehabilitation Center Project components that are part of the Refined Project.

IT IS RECOMMENDED THAT THE BOARD:

1. Certify that the Addendum to the previously certified Final Environmental Impact Report for the Rancho Los Amigos National Rehabilitation Center Project has been completed in compliance with the California Environmental Quality Act and reflects the independent judgment and analysis of the County; find that the Board has reviewed and considered the information contained in

"To Enrich Lives Through Effective And Caring Service"

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Intra-County Correspondence Sent Electronically Only*

Board of Supervisors
GLORIA MOLINA
First District

MARK RIDLEY-THOMAS
Second District

ZEV YAROSLAVSKY
Third District

DON KNABE
Fourth District

MICHAEL D. ANTONOVICH
Fifth District

the Addendum and the Final Environmental Impact Report prior to approving the Refined Project.

2. Approve the Rancho Los Amigos National Rehabilitation Center Refined Project, which increases demolition and decreases new construction to provide a more efficient strategy for providing critical healthcare services.
3. Approve the total revised Project budget in the amount of \$162,261,000 for the Rancho Los Amigos National Rehabilitation Center Seismic Retrofit Compliance and Inpatient Consolidation Project, Capital Project No. 69334.
4. Establish Capital Project No. 69656 and approve the total Project budget in the amount of \$86,405,000 for the Rancho Los Amigos National Rehabilitation Center New Outpatient Facilities Project.
5. Establish Capital Project No. 87150 and approve the total Project budget in the amount of \$85,295,000 for the Rancho Los Amigos National Rehabilitation Center Support Services Annex and Harriman Building Renovations Project.
6. Establish Capital Project No. 69663 and approve the total Project budget in the amount of \$70,801,000 for the Rancho Los Amigos National Rehabilitation Center North Campus Infrastructure and Demolition Project.
7. Award and authorize the Director of Public Works, or her designee, to execute architectural/engineering and consultant services agreements with M. Arthur Gensler and Associates, Inc., for the Rancho Los Amigos National Rehabilitation Center Project components totaling \$15,096,975: \$2,740,975 for the Rancho Los Amigos National Rehabilitation Center Seismic Retrofit Compliance and Inpatient Consolidation Project (Capital Project No. 69334); \$1,082,000 for the Rancho Los Amigos National Rehabilitation Center New Outpatient Facilities Project (Capital Project No. 69656); \$5,750,000 for the Support Services Annex and Harriman Building Renovations Project (Capital Project No. 87150); and \$1,067,000 and \$4,457,000 for the Rancho Los Amigos National Rehabilitation Center North Campus Infrastructure and Demolition Project (Capital Project No. 69663).
8. Authorize the Director of Public Works, or her designee, to execute consultant service agreements to pay stipends in the amount of \$325,000 to the second and third highest ranked, qualified proposers that are not selected as the best-value design-builder (or to the top three highest ranking, qualified proposers if no design-build contract is awarded) for the Rancho Los Amigos National

Rehabilitation Center Seismic Retrofit Compliance and Inpatient Consolidation Project (Capital Project No. 69334), the Rancho Los Amigos National Rehabilitation Center New Outpatient Facilities Project (Capital Project No. 69656), and the portion of the Rancho Los Amigos National Rehabilitation Center North Campus Infrastructure and Demolition Project that support these projects (Capital Project No. 69663), enabling the County to use all design and construction ideas and concepts that will be included within their proposals.

9. Authorize the Director of Public Works, or her designee, to demolish Building 700, Building 800, and miscellaneous small structures, do the make ready work, and construct the interim facilities using Board-approved Job Order Contracts.
10. Authorize the Director of Public Works, or her designee, to deliver the Support Services Annex and Harriman Building Renovations Project (Capital Project No. 87150) and the remaining portion of the North Campus Infrastructure and Demolition Project (Capital Project No. 69663), using Board-approved Job Order Contracts.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

Approval of the recommendations will certify the Addendum to the Final Environmental Impact Report (EIR) for the Rancho Los Amigos National Rehabilitation Center (RLANRC) and allow the Department of Public Works (Public Works) to proceed with design of the RLANRC Project components.

The recommended RLANRC plan would be implemented through the following four Project components:

- Seismic Retrofit Compliance/Inpatient Consolidation Project;
- Outpatient Consolidation Project;
- Support Services Annex and Harriman Building Renovation Project; and
- North Campus Infrastructure and Demolition Project.

In the aggregate, the RLANRC Projects entail the consolidation of inpatient, outpatient, and administrative support services to meet State-mandated seismic safety requirements, replacement of obsolescent and deteriorating facilities, and optimization of operational efficiencies. Under the recommended plan, 937,000 square-foot of existing building space will be reduced by 38.3 percent to 579,000 square-foot of new and renovated facilities. This consolidation is expected to generate over \$2.9 million in

immediate savings in annual utility, maintenance, and staffing costs and position Rancho's north campus for further development in the future.

Background

In April 2006, the Board approved the consolidation of inpatient services at RLANRC into an expanded Jacqueline Perry Institute (JPI) facility as a cost-effective means of satisfying the seismic retrofit requirements of Senate Bill (SB) 1953. The consolidation plan offered several benefits including: 1) lower cost of new construction compared to the retrofit of the existing inpatient facilities; and 2) the efficiencies and annual operating savings provided by new, sustainable facilities and the closure of existing, outdated buildings.

Given the reconfiguration of the campus' infrastructure that will be required by the consolidation of the inpatient care activities, the high level of functional interaction between outpatient and inpatient services, and the opportunity for increased efficiencies, consolidation of outpatient services into two new facilities is now being presented for consideration by the Board.

Inpatient Services

In November 2006, the Board authorized Public Works to execute two consultant services agreements to initiate the design and environmental documents for the RLANRC Seismic Retrofit and Inpatient Consolidation Project. This Project includes the renovation and expansion of the JPI building to expand acute inpatient care; renovation of the Support Services Annex (SSA) building to accommodate dietary services; renovation of the Harriman building to house administrative services; and the consolidation of outpatient services in a new building. Since then, we have completed the renovation of the dietary area within the SSA and completed the programming validation for the remainder of the RLANRC Seismic Retrofit and Inpatient Consolidation Project.

In October 2009, upon direction of a Board motion, an assessment of capital options to address emergency room overflow and patient overcrowding at County-owned hospitals was completed by HDR Architecture Inc., (HDR) in May 2010. HDR found that a system-wide deficit of 33 "available" medical-surgical beds and a total deficit of 159 "budgeted" medical-surgical beds existed within the County inpatient system. HDR recommended additional beds to alleviate overflow and overcrowding at each medical campus.

These recommendations, however, did not consider the impacts of healthcare reform, Department of Health Services (Health Services) operational improvements, the opening of Martin Luther King, Jr. Hospital, or the passage of the California 1115 Medicaid Waiver. An addendum to the report was prepared by HDR, which assessed the impact of these initiatives on the County's emergency room demand and determined that while additional beds would not be required in five years, the County should continue to develop capital options should the need for additional beds remain.

The recommended RLANRC Seismic Retrofit Compliance and Inpatient Consolidation Project provides sufficient space adjacent to the JPI and Annex buildings to accommodate a future expansion of inpatient facilities, if deemed necessary by the Board.

Recommended Actions

The recommended consolidation of inpatient services entails the renovation of approximately 24,000 square-feet of the existing 174,677 square-foot JPI building and construction of a new 56,000 square-foot annex to the north side of the building, relocation of the JPI loading dock, renovation of the central plant, demolition of Buildings 700 and 800, interim facilities for move management, and sitework. The new Annex and renovated JPI facility will provide a licensed 162-bed facility along with associated rehabilitation support space and required diagnostic and treatment services.

In December 2009, the Board approved the Acute Care Facilities Plan, in accordance with SB 306, which extended the deadline to meet the SB 1953 Seismic Retrofit requirements to January 1, 2020. The Acute Care Facilities Plan recommended consolidation of acute care rehabilitation services into new or renovated facilities and is part of the RLANRC Seismic Retrofit and Inpatient Consolidation Project.

Under SB 306, the State Office of State Health and Planning Department (OSHPD) requires projects with a cost exceeding \$20.0 million to comply with incremental review submissions, pursuant to California Building Standards Administrative Code. Incremental submissions represent individual, but complete, phases of construction (e.g. make ready and demolition, foundation, structural framing, and architectural, mechanical, and electrical work).

As a design-build Project, the RLANRC Seismic Retrofit Compliance and Inpatient Consolidation Project will lend itself well to this incremental review method and allow for the flexibility needed to ensure that the County meets all of the milestones required for SB 306. To meet the first milestone and maintain the eligibility for the extension under SB 306, the County must submit the make-ready and demolition package, including

geotechnical reports to OSHPD by January 1, 2013. Approval of the recommended actions will allow the County to meet this deadline.

Outpatient, Administrative, and Support Services

Since the Board's action in December 2009, we have continued to work with Health Services and the hospital to quantify space requirements for its support and outpatient functions. Space requirements for RLANRC support functions and services for approximately 75,000 annual outpatient visits have been identified. Based on these studies, construction of two facilities totaling approximately 107,000 square-feet, the renovation of approximately 30,000 of the existing 67,000 square-foot SSA building, and the renovation of the Harriman Building are proposed to consolidate outpatient and support services currently located in multiple buildings throughout RLANRC.

The consolidation of outpatient services will provide significant annual operating savings while achieving service efficiency. Outpatient services are currently housed in seven different facilities totaling approximately 319,000 square-feet throughout the hospital campus. The proposed construction of two new outpatient facilities, renovation of a portion of the SSA building, and the renovation of the Harriman building would consolidate outpatient services into four facilities and allow the Rancho Rehabilitation Center to contribute toward an estimated \$2.9 million in annual operational savings.

The proposed construction of two outpatient facilities, totaling approximately 107,000 square-feet will house outpatient and support services and will be located in close proximity to the new acute-care building addition. These services and departments include, but are not limited to, otolaryngology, urology, medical homes and specialty clinics, ambulatory care, occupational health, dental clinics, laboratories, physical, occupational, speech, recreational therapy, vocational rehabilitation, seating center, educational center, the Center for Applied Rehabilitation Technology, the Model Home, adaptive driving program, clinical psychology, Marilyn Hilton Resource Center, outpatient pharmacy, and pathokinesiology laboratory. Sustainable design features will be incorporated to achieve a Leadership in Energy and Environmental Design (LEED) Silver rating

SSA and Harriman Building Renovations Project (Capital Project No. 87150)

The renovation of the SSA and Harriman Buildings is recommended in order to house RLANRC's administrative and support services and better integrate the medical research and educational functions of the resident, non-profit Los Amigos Research and Education Institute (LAREI).

The proposed SSA Building renovation of this Project component consists of the renovation of approximately 30,000 square-feet of the existing 67,000 square-foot, two-story structure. Renovations include the reconfiguration of office space to accommodate administrative and support services, such as facilities management, information systems and communications, dietary, medical record administration, patient financial services/call center, hospital finance, and consolidation of LAREI's functions.

The Harriman Building is eligible for the State's Register of Historical Resources and the National Register of Historic Places and is compatible with housing administrative services. Originally built in 1931, the two-story rectangular structure is cast-in-place concrete with barrel clay tile roof and has a mission-style façade. The electrical, mechanical, heating, cooling, ventilation, plumbing, fire suppression, and data and telecommunication systems are obsolete or do not have adequate capacity to serve the building renovation and will be replaced in their entirety. The building will also be seismically upgraded and special attention will be given to preserving the historical character-defining features and sustainable design features and technologies will be incorporated. The administrative services housed in the renovated building will include, but are not limited to, social work, human resources/work force development, risk management, hospital administration, Central Admission Referral Office (CARO) services, case management, nursing administration/nursing education, physician offices, employee's union, and neurosciences lab.

North Campus Infrastructure and Demolition Project (Capital Project No. 69663)

The development for consolidation of the medical functions includes the demolition of approximately 521,000 square-feet and construction of an additional 163,000 square-feet, thus reducing the required footprint of development on the north RLAC campus. Included in the demolition are Buildings 100, 500, 600, 900, the Medical Science Building, and other small miscellaneous structures. These buildings are no longer compliant with OSHPD standards, are inefficient, costly to maintain, and have exceeded their useful life.

The proposed demolition of the older and non-compliant OSHPD buildings focuses a review of the re-routing and installation of underground utilities. The Rancho Los Amigos campus has been active for approximately 120 years. Utilities were installed to meet the buildings built throughout the years and are now obsolete and unreliable. Repairs to the utilities have been made over the past decades, but due to the poor condition, the existing utilities are increasingly difficult to maintain and inefficient. This Project will provide a modern utility infrastructure system to allow for sufficient utility capacity to support the new development of the north campus. The new

systems include, but are not limited to, mechanical, electrical, plumbing, fire, storm water and wastewater management, gas, power, and telecommunication, and improvements of the landscaping, roads and pathways. Sustainable design and technology will be incorporated.

EIR Addendum

In April 1992, the Board certified the Final EIR for the RLANRC (Approved Project), which consists of the renovation and development of approximately 1,365,000 square-feet of medical facilities, including consolidation of existing health services and facilities into new buildings on the north campus. Upon completion, the 1992 Approved Project was to house a new state-of-the-art, 600-bed medical rehabilitation facility, including renovations to some existing buildings, demolition of other buildings, and construction of new buildings to accommodate the new modern medical facility. The 1992 Approved Project was only partially implemented with the construction of the JPI building, SSA building, and a parking structure.

The proposed RLANRC Seismic Retrofit and Inpatient Consolidation Project, including all of the components required changes to the Approved Project which resulted in the need for minor modifications and refinements to the previous EIR. These refinements have been analyzed and it was determined that they would not result in new significant effects or substantially more severe effect than those documented in the previously certified EIR. Therefore, a subsequent EIR was not required and an Addendum to the EIR was prepared to address environmental impacts from the changes reflected in the RLANRC Refined Project.

Proposed Refined Project

The proposed RLANRC Refined Project, which is the focus of the Addendum to the North Campus Site Consolidation Project including all related project components, proposes a reduction in capacity at RLANRC in comparison to the Approved Project, requiring an increase in demolition and a decrease in new construction, which would result in consolidation of fewer licensed hospital beds in the remaining hospital facilities, a relocation and consolidation of the outpatient buildings, addition of a kitchen to the SSA, and the possible veteran housing component. In addition, several vacant under-utilized buildings are proposed to be demolished. The RLANRC Refined Project is anticipated to be a more efficient strategy for providing critical healthcare services in light of severe resource constraints.

Specifically, the RLANRC Refined Project consists of the renovation and development of approximately 593,315 square-feet and includes a reduction of licensed hospital beds to allow for up to 200 beds, thus reducing the required footprint of development for consolidation of the medical functions on the north campus. This reduction in footprint would allow for the demolition of the remaining SB 1953 noncompliant buildings on the north campus. Additionally, the RLANRC Refined Project also includes construction of the outpatient facilities and remodel of the Harriman Building.

The RLANRC Refined Project, compared to the 1992 Approved Project, proposes more demolition and less construction. Specifically, the RLANRC Refined Project proposes additional building demolition and a small net decrease in construction. The RLANRC Refined Project achieves the following objectives:

- consolidates inpatient and outpatient services for rehabilitation services in dedicated buildings to optimize operational effectiveness while reducing operations and maintenance costs;
- reduces the number of licensed beds from 396 to 200 to improve the operational efficiency of RLANRC while maintaining its role in the County's health care system;
- maintains nationally recognized level of services of rehabilitation treatment modalities;
- provides outpatient facilities to accommodate the annual visits consistent with the space program assessment;
- implements the County's Energy and Environmental Policy by incorporating sustainable design criteria for water efficiency, energy efficiency, and indoor air quality; and
- ensures that new construction will enhance visual aesthetics by complementing the surrounding community and conserving the historic elements of the Project area.

Architectural/Engineering and Consulting Services Agreements

It is recommended that the Board award, and authorize Public Works to execute architectural/engineering and consultant services agreements with Gensler to provide the following design services for the RLANRC Projects:

- Execute consultant services agreement to provide scoping design services for the RLANRC Seismic Retrofit and Inpatient Consolidation Project for a \$2,740,975 not-to-exceed fee;
- Execute consultant services agreement to provide scoping design services for the RLANRC New Outpatient Facilities Project for a \$1,082,000 not-to-exceed fee;
- Execute architectural/engineer agreement for full design services for the SSA and Harriman Building Renovations Project for a \$5,750,000 not-to-exceed fee;
- Execute consultant services agreement to provide scoping design services for the west portion of the RLANRC North Campus Infrastructure and Demolition Project for a \$1,067,000 not-to-exceed fee; and
- Execute architectural/engineer agreement to provide full design services for the remaining portions of the RLANRC North Campus Infrastructure and Demolition Project for a \$4,457,000 not-to-exceed fee.

Proposed Construction Methods

Upon completion of the scoping documents phase for the RLANRC Seismic Retrofit and Inpatient Consolidation Project, we will prepare a Request for Proposals (RFP) for design-build services for the following Project components: RLANRC Seismic Retrofit and Inpatient Consolidation Project, the RLANRC New Outpatient Facilities Project, and the portion of the RLANRC North Campus Infrastructure and Demolition Project, which supports these projects, following the Board's approved policy.

In connection with the design-build RFP for the Project components, stipends of \$325,000 will be provided via consultant services agreements to the second and third highest ranked, qualifying proposers that are not selected as the best-value design-builder, which will afford the County the right to use the information and ideas submitted by the proposers. Upon the Board's approval to execute the design-build agreement anticipated for Spring 2014, the second and third highest ranked qualifying proposers, not selected as the design-builder, will each be paid a stipend of \$325,000. If the Board elects not to award the design-build agreement, the top three highest ranked, qualifying proposers will each be paid a stipend of \$325,000 pursuant to consultant services agreements.

Upon authorization, we will be using Board-approved Job Order Contracts (JOC) for the following work:

- The demolition of Buildings 700, 800, and miscellaneous smaller structures;
- The make-ready work, including re-routing of utilities and preparation work needed to prepare the site for the design build team;
- The renovation of spaces in existing buildings and move management to temporarily house the services of the demolished or renovated buildings;
- The construction of the SSA and Harriman Building Renovations Project following completion of the construction documents and jurisdiction approvals; and
- The demolition of the remaining non-compliant OSHPD buildings and construction of the utility infrastructure system to allow for sufficient utility capacity to support the new development of the north campus following completion of the construction documents and jurisdiction approval.

It is recommended that the Board approve the proposed RLANRC Project components. We will return to the Board with a recommendation for the future development of the remaining north campus site.

Implementation of Strategic Plan Goals

The Countywide Strategic Plan directs the provision of Operational Effectiveness (Goal 1) by maximizing the effectiveness of process, structure, and operations to support timely delivery of customer-oriented and efficient public services. It also directs that we ensure Fiscal Sustainability (Goal 2) by strengthening and enhancing the County's capacity to sustain essential County services through proactive and prudent fiscal policies and stewardship. Lastly, it directs us to provide Integrated Services Delivery (Goal 3) by maximizing opportunities to measurably improve client and community outcomes and leverage resources through the continuous integration of health, community, and public safety services.

Green Building/Sustainable Design Program

The proposed Project components will comply with the County's Energy and Environmental Policy. The Project components will be designed and constructed to

achieve the United States Green Building Council's LEED Silver level certification in compliance with adopted Board policy.

FISCAL IMPACT/FINANCING

The total cost of the RLANRC Projects is estimated at \$404,762,000 and includes the following components: RLANRC Seismic Retrofit and Inpatient Consolidation Project, the RLANRC New Outpatient Facilities Project, the RLANRC SSA and Harriman Building Renovations Project, and the RLANRC North Campus Infrastructure and Demolition Project needed to support these Projects. The total cost includes plans and specifications, the recommended design services agreement, plan check, construction, consultant services, Civic Art allocation, and County services. The total cost does not include any leasing or purchasing of medical equipment. The medical equipment cost will be funded by Health Services. Public Works will work closely with Health Services with the planning of the medical equipment procurement.

In 2006, the total Project cost for RLANRC Seismic Retrofit and Inpatient Consolidation Project was estimated at \$55,000,000. Since then, the following components have been added to the Project, which has attributed to the increase in cost: increase of the JPI addition from 36,000 to 56,000 square-feet; renovation of 10,000 square-feet of the loading dock, renovation of the Central Plant; construction of two new outpatient facilities totaling 107,000 square-feet; demolition of additional buildings; renovation of 30,000 square-feet of the SSA building, and the renovation of the historic 75,800 square-feet Harriman building, as well as infrastructure upgrades needed to support the Project.

The recommended architectural/engineering and consultant services agreements for the aggregate \$15,096,975 not-to-exceed fee is included in the total estimated Project budget of \$404,762,000. Sufficient funds are available in the Fiscal Year (FY) 2012-13 Capital Projects/Refurbishment Budget for award of the recommended architectural agreement. The Project Schedule and Budget Summary are included in Attachment A.

It is anticipated that the RLANRC Seismic Retrofit and Inpatient Consolidation Project and all of the related project components will be financed initially through the issuance of tax-exempt commercial paper, and ultimately through the issuance of long-term, tax-exempt bonds. We will return with the Treasurer Tax Collector with recommendations on the long-term financing of the Project.

Operating Budget Impact

Based on the Project components, Health Services estimates an immediate annual savings of \$2.9 million, including:

- \$1.2 million – Space Consolidation
- \$1.7 million – Operational and Clinical Flow Efficiencies

Health Services will work with the Chief Executive Office to confirm the appropriate level of funding coinciding with the FY the Project component is completed.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

The contracts will contain terms and conditions supporting the Board's ordinances and policies, including, but not limited to: County Code Chapter 2.200, Child Support Compliance Program; County Code Chapter 2.202, Contractor Responsibility and Debarment; County Code Chapter 2.203, Contractor Employee Jury Service Program; County Code Chapter 2.206, Defaulted Property Tax Reduction Program; Board Policy 5.050, County's Greater Avenues for Independence (GAIN) and General Relief Opportunities for Work (GROW) Programs; Board Policy 5.060, Reporting of Improper Solicitations; Board Policy 5.110, Contract Language to Assist in Placement of Displaced County Workers; and Board Policy 5.135, Notice to Contract Employees of Newborn Abandonment Law (Safely Surrendered Baby Law). The proposed supplemental agreement will be approved as to form by County Counsel.

As required by the Board, the proposed Project will include the maximum \$1 million to be allocated to the Civic Arts Special Fund, in accordance with the Board's Civic Art Policy adopted on December 7, 2004, and revised on December 15, 2009.

ENVIRONMENTAL DOCUMENTATION

The original Approved Project analyzed in the 1992 EIR, and certified by the Board on April 7, 1992, included an expansion project that has been partially constructed. The RLANRC Refined Project recommends a reduction in capacity that requires more demolition and limits new construction to the consolidation of facilities, resulting in fewer licensed hospital beds in the remaining hospital.

An Addendum to the previously certified EIR was prepared for the RLANRC Refined Project since some changes or additions to the EIR were required as a result of the refinements to the original Project; however, none of the conditions, which would require the preparation of a subsequent EIR have occurred.

The Addendum to the Final EIR (Attachment B) analyzes potential environmental effects associated with changes in Project scope and a reduction of licensed hospital beds at the RLANRC. This will consolidate the medical functions on the north campus, which will result in a reduction of footprint and would allow for demolition of the remaining SB 1953 noncompliant buildings. The Addendum to the Final EIR demonstrates that environmental impacts resulting from the RLANRC Refined Project would not result in any new significant impacts beyond those previously analyzed in the Final EIR nor would it result in a substantial increase in the severity of significant impacts previously identified in the EIR. For the RLANRC Refined Project, the County will continue to comply with applicable mitigation measures adopted as part of the previous EIR process.

The location of the documents and other material constituting the record upon which the Board's decision is based in this matter is the County of Los Angeles Department of Public Works, Project Management Division II, 900 South Fremont Avenue, 5th Floor Alhambra, California 91803.

Upon the Board's approval of the RLANRC Refined Project, Public Works will file a Notice of Determination with the Registrar-Recorder/County Clerk in accordance with Section 21152(a) of the California Public Resources Code.

CONTRACTING PROCESS

In November 2006, the Board awarded and authorized an agreement with Gensler to provide Executive Campus Planner services based on a qualifications-based selection competitive selection process. Provisions were included in the RFP that schematic design services, at a minimum, would be required from the Executive Campus Planner for each Project that is part of the development of the campus. The RFP also stated that the County, at its option, could require full service design and construction administration services from the Executive Campus Planner for each Project. The recommended services are within the scope of the RFP and the resulting agreement with Gensler.

In November 2006, the Board authorized the Director of Public Works, or her designee, to execute an agreement with Gensler to provide design services for a \$4,396,000 not-to-exceed fee. However, Public Works only executed the following for a total of \$1,577,025 based on contract limitations:

Agreement Number	Description	Amount
Agreement PW 03113	Program Validation	\$ 789,211
Agreement PW 013031	SSA Kitchen	\$ 633,923
Supplemental Agreement 1	Construction Administration (CA) Services	\$ 50,088
Supplemental Agreement 2	Additional Design Services	\$ 38,373
Supplemental Agreement 3	Additional CA Services	\$ 53,025
Supplemental Agreement 4	Additional Design Services	\$ 12,405
	Total Amount Executed	\$1,577,025

Standard Agreements, in the form previously approved by County Counsel, will be used. The standard Board-directed clauses that provide for contract termination, renegotiation, and hiring qualified displaced County employees will be included in the contract.

Execution of the agreements for \$2,740,975 for the RLANRC Seismic Retrofit and Inpatient Consolidation Project, \$1,082,000 for the RLANRC New Outpatient Facilities Project, \$5,750,000 for the SSA and Harriman Building Renovations Project, and \$5,524,000 for the RLANRC North Campus Infrastructure and Demolition Project will allow Gensler to prepare design documents required for these RLANRC Project components.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

There will be no impact on current County services or projects during the performance of the recommended actions.

The Honorable Board of Supervisors
November 7, 2012
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CONCLUSION

Please return one adopted copy of this Board letter to the Chief Executive Office, Capital Projects Division; Department of Health Services, Capital Projects Division; and the Department of Public Works, Project Management Division II.

Respectfully submitted,



WILLIAM T FUJIOKA
Chief Executive Officer

WTF:RLR:DJT
DKM:HC:mda

Attachments

c: Executive Office, Board of Supervisors
County Counsel
Arts Commission
Health Services
Public Works

**DEPARTMENT OF PUBLIC WORKS:
RANCHO LOS AMIGOS NATIONAL REHABILITATION CENTER SENATE BILL 1953
COMPLIANCE AND NORTH CAMPUS SITE CONSOLIDATION PROJECT (CAPITAL
PROJECT NO. 69334), CERTIFY THE ADDENDUM TO THE FINAL
ENVIRONMENTAL IMPACT REPORT, APPROVE THE REFINEMENTS TO THE
APPROVED PROJECT, ESTABLISH CAPITAL PROJECT NO. 69656 FOR THE NEW
OUTPATIENT FACILITIES PROJECT, CAPITAL PROJECT NO. 87150 FOR THE
SSA AND HARRIMAN BUILDING RENOVATIONS PROJECT, AND CAPITAL
PROJECT NO. 69663 FOR THE NORTH CAMPUS INFRASTRUCTURE AND
DEMOLITION PROJECT, AND AWARD AGREEMENTS
(FOURTH DISTRICT) (3 VOTES)**

I. PROJECT SCHEDULE

Project Activity	Scheduled Completion Date
Environmental Impact Report	04/27/1992*
Addendum to Environmental Impact Report	11/07/2012
North Campus Site Consolidation Project (C.P. 69334)	
Programming	06/15/2009*
Scoping Documents	
Demolition Package to OSHPD	12/31/2012
Site Investigation	04/30/2013
Final Scoping Documents	07/29/2013
Make Ready	
Design	02/28/2013
Jurisdictional Approval	06/30/2013
Construction Bid and Award (JOC)	08/30/2013
Construction	
Substantial Completion	07/30/2014
Project Acceptance	09/30/2014
Design-Build	
Design and Construction Award	05/30/2014
Jurisdictional Approval	11/30/2015
Construction	
Substantial Completion	6/29/2018
Project Acceptance	12/31/2018

I. PROJECT SCHEDULE

New Outpatient Facilities (C.P. 69656)	
Programming	Completed*
Project Scoping Documents	07/29/2013
Design and Construction Award	05/30/2014
Jurisdictional Approval	08/31/2015
Construction	
Substantial Completion	04/28/2017
Project Acceptance	10/30/2017
SSA and Harriman Building (C.P. 87150)	
Programming	05/31/2013
Design	05/30/2014
Jurisdictional Approval	11/14/2014
Construction Bid and Award (JOC)	06/15/2015
Construction	
Substantial Completion	03/31/2017
Project Acceptance	08/30/2017
(C.P. 69663)	
North Campus Infrastructure and Demolition Project - West Portion	
Programming	04/30/2013
Project Scoping Documents	07/31/2013
Design and Construction Award	05/31/2014
Jurisdictional Approval	11/30/2015
Construction	
Substantial Completion	01/31/2017
Project Acceptance	06/30/2017
North Campus Infrastructure and Demolition Project - Remaining Portions	
Design	03/31/2017
Jurisdictional Approval	08/30/2017
Construction Bid and Award (JOC)	03/30/2018
Construction	
Substantial Completion	03/30/2020
Project Acceptance	06/30/2020

II. PROJECT BUDGET SUMMARY
North Campus Site Consolidation Project (C.P. 69334)

Budget Category	Previously Approved Budget	Impact of this Action	Revised Project Budget
Land Acquisition	\$ 0	\$ 0	\$ 0
Construction			
Job Order Contracts	\$ 0	\$ 19,044,000	\$ 19,044,000
Construction Contract	26,300,000	78,483,000	104,783,000
Change Orders	3,990,000	7,760,000	11,750,000
Proposer Stipends		975,000	975,000
Equipment	1,100,000	(1,100,000)	0
Gordian Group	0	370,000	370,000
Civic Arts	300,000	300,000	600,000
Subtotal	\$ 31,690,000	\$ 105,832,000	\$ 137,522,000
Programming/Development	\$ 0	\$ 0	\$ 0
Plans and Specifications	\$ 4,396,000	\$ (78,000)	\$ 4,318,000
Consultant Services			
Deputy Inspection	\$ 0	\$ 1,800,000	\$ 1,800,000
Hazardous Materials	0	300,000	300,000
Geotech/SoilsTest	0	300,000	300,000
Material Testing	0	500,000	500,000
Cost Estimating	0	500,000	500,000
Topographic Surveys	0	200,000	200,000
Construction Management	0	1,200,000	1,200,000
Other	1,225,000	(1,225,000)	0
Subtotal	\$ 1,225,000	\$3,575,000	\$ 4,800,000
Miscellaneous Expenditures			
Office of Affirmative Action	\$ 20,000	\$ 230,000	\$ 250,000
Printing	22,000	328,000	350,000
Subtotal	\$ 42,000	\$ 558,000	\$ 600,000
Jurisdictional Review/Plan Check/Permit			
Regional Planning	\$ 0	\$ 30,000	\$ 30,000
Fire Department	0	150,000	150,000
Health Department	0	150,000	150,000
Air Quality Management District	0	35,000	35,000
Material Engineering	0	35,000	35,000
Land Development Support Services	0	35,000	35,000
OSHPD	629,000	1,371,000	2,000,000
Building and Safety Plan Check	0	108,000	108,000
Subtotal	\$ 629,000	\$ 1,914,000	\$ 2,543,000
County Services			
Code Compliance	\$ 0	\$2,400,000	\$ 2,400,000
Design Review	0	390,000	390,000
Contract Administration	4,018,000	(3,518,000)	500,000
Project Management	0	5,388,000	5,388,000
Project Management Support Services	0	2,500,000	2,500,000
Project Technical Support	0	1,000,000	1,000,000
Consultant Contract Recovery	0	300,000	300,000
Subtotal	\$ 4,018,000	\$ 8,460,000	\$ 12,478,000
Prior Expenditures	\$ 0	\$ 0	\$ 0
Total	\$ 42,000,000	\$ 120,261,000	\$ 162,261,000

I. PROJECT BUDGET SUMMARY
New Outpatient Facilities (C.P. 69656)

Budget Category	Project Budget
Land Acquisition	\$ 0
Construction	
Job Order Contracts	\$ 0
Construction Contract	64,895,000
Change Orders	6,239,000
Equipment	0
Gordian Group	0
Civic Arts	400,000
Subtotal	\$ 71,534,000
Plans and Specifications	\$ 1,082,000
Consultant Services	
Deputy Inspection	\$ 1,500,000
Hazardous Materials	50,000
Geotech/Soils Test	210,000
Material Testing	500,000
Cost Estimating	320,000
Topographic Surveys	225,000
Construction Management	586,000
Subtotal	\$ 3,391,000
Miscellaneous Expenditures	
Office of Affirmative Action	\$ 135,000
Printing	110,000
Subtotal	\$ 245,000
Jurisdictional Review/Plan Check/Permit	
Regional Planning	\$ 30,000
Fire Department	70,000
Health Department	70,000
Air Quality Management District	35,000
Material Engineering	35,000
Land Development Support Services	100,000
Building and Safety Plan Check	410,000
Subtotal	\$ 750,000
County Services	
Code Compliance	\$ 3,100,000
Design Review	155,000
Contract Administration	242,000
Project Management	2,815,000
Project Management Support Services	2,250,000
Project Technical Support	550,000
Consultant Contract Recovery	291,000
Subtotal	\$ 9,403,000
Total	\$ 86,405,000

**II. PROJECT BUDGET SUMMARY
SSA and Harriman Building (C.P. 87150)**

Budget Category	Project Budget
Land Acquisition	\$ 0
Construction	
Job Order Contracts	\$ 62,864,000
Construction Contract	0
Change Orders	6,525,000
Equipment	0
Gordian Group	1,360,000
Civic Arts	0
Subtotal	\$ 70,749,000
Plans and Specifications	\$5,750,000
Consultant Services	
Deputy Inspection	\$ 525,000
Hazardous Materials	500,000
Geotech/Soils Test	225,000
Material Testing	250,000
Cost Estimating	120,000
Topographic Surveys	50,000
Construction Management	950,000
Subtotal	\$ 2,620,000
Miscellaneous Expenditures	
Office of Affirmative Action	\$ 95,000
Printing	75,000
Subtotal	\$ 170,000
Jurisdictional Review/Plan Check/Permit	
Regional Planning	\$ 25,000
Fire Department	30,000
Health Department	30,000
Air Quality Management District	33,000
Material Engineering	33,000
Land Development Support Services	35,000
Building and Safety Plan Check	470,000
Subtotal	\$ 656,000
County Services	
Code Compliance	\$ 1,200,000
Design Review	100,000
Contract Administration	160,000
Project Management	1,412,000
Project Management Support Services	1,900,000
Project Technical Support	350,000
Consultant Contract Recovery	228,000
Subtotal	\$ 5,350,000
Total	\$ 85,295,000

II. PROJECT BUDGET SUMMARY
North Campus Infrastructure and Demolition Project (C.P. 69663)

Budget Category	Project Budget
Land Acquisition	\$ 0
Construction	\$ 0
Job Order Contracts	24,675,000
Construction Contract	23,469,000
Change Orders	4,796,000
Equipment	0
Gordian Group	525,000
Civic Arts	0
Subtotal	\$ 53,465,000
Plans and Specifications	\$ 5,524,000
Consultant Services	
Deputy Inspection	\$ 750,000
Hazardous Materials	815,000
Geotech/Soils Test	350,000
Material Testing	350,000
Cost Estimating	200,000
Topographic Surveys	200,000
Construction Management	965,000
Subtotal	\$ 3,630,000
Miscellaneous Expenditures	
Office of Affirmative Action	\$ 108,000
Printing	235,000
Subtotal	\$ 343,000
Jurisdictional Review/Plan Check/Permit	
Regional Planning	\$ 20,000
Fire Department	60,000
Health Department	20,000
Air Quality Management District	45,000
Material Engineering	30,000
Land Development Support Services	200,000
Building and Safety Plan Check	284,000
Subtotal	\$ 659,000
County Services	
Code Compliance	\$ 1,400,000
Design Review	200,000
Contract Administration	230,000
Project Management	2,610,000
Project Management Support Services	2,000,000
Project Technical Support	500,000
Consultant Contract Recovery	240,000
Subtotal	\$ 7,180,000
Total	\$ 70,801,000

ATTACHMENT B

**DEPARTMENT OF PUBLIC WORKS:
RANCHO LOS AMIGOS NATIONAL REHABILITATION CENTER SENATE BILL 1953
COMPLIANCE AND NORTH CAMPUS SITE CONSOLIDATION PROJECT
CERTIFY THE ADDENDUM TO THE FINAL ENVIRONMENTAL IMPACT REPORT,
APPROVE THE REFINEMENTS TO THE APPROVED PROJECT, ESTABLISH
CAPITAL PROJECT NO. 69656 FOR THE NEW OUTPATIENT FACILITIES
PROJECT, CAPITAL PROJECT NO. 87150 FOR THE SSA AND HARRIMAN
BUILDING RENOVATIONS PROJECT, AND CAPITAL PROJECT NO. 69663 FOR
THE NORTH CAMPUS INFRASTRUCTURE AND DEMOLITION PROJECT, AND
AWARD AGREEMENTS
(FOURTH DISTRICT) (3 VOTES)**

**RANCHO LOS AMIGOS MEDICAL CENTER
ADDENDUM TO THE FINAL ENVIRONMENT**

RANCHO LOS AMIGOS
NORTH CAMPUS SITE CONSOLIDATION

ADDENDUM No. 1 TO THE ENVIRONMENTAL IMPACT REPORT
(SCH No. 91071053)

PREPARED FOR:

COUNTY OF LOS ANGELES CHIEF EXECUTIVE OFFICE
KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET
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PREPARED BY:

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OCTOBER 24, 2012

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APPENDIX

A	URBEMIS 2007 Modeling Results
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SECTION 1.0 INTRODUCTION

This Addendum No. 1 to the Environmental Impact Report (EIR) has been prepared by the County of Los Angeles (County) to assess the environmental consequences of the North Campus Site Consolidation (refined project), which includes proposed refinements to the project described in the County's certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ This document is prepared as an addendum to the previously certified EIR in accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15164, which requires that an Addendum to an EIR be prepared when changes to an approved project will require minor modifications to the previous EIR rather than major changes due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. CEQA requires that an EIR be prepared for projects that may have a significant effect on the environment.² If changes to a project are necessary after an EIR has been certified and are not considered substantial,³ CEQA provides that an Addendum to an EIR may be prepared to document minor technical changes or additions to a previously approved project.⁴ In accordance with State CEQA Guidelines Section 15164 regarding minor modifications to a previously approved EIR, this Addendum No. 1 to the EIR incorporates, by reference, discussions from the 1992 certified EIR and concentrates solely on the issues specific to the refined project.

The project analyzed in the EIR certified in 1992 included an expansion project that has been only partially constructed. The refined project for which this Addendum EIR is prepared proposes a reduction in capacity at Rancho Los Amigos in comparison to the approved project, requiring an increase in demolition and a decrease in new construction, that would result in consolidation of fewer licensed hospital beds in the remaining hospital facilities, a relocation of the outpatient building, and the addition of a kitchen to the Support Services Annex. In addition, several vacant underutilized buildings are proposed to be demolished. The refined project is anticipated to be a more efficient strategy for providing critical health care services in light of severe resource constraints. In addition, the refined project may include a veteran housing component within the project boundaries and within the maximum total development cited in the certified EIR. The County is the lead agency for the refined project pursuant to CEQA. If federal funding is to be received for the veteran housing, the refined project would be subject to the National Environmental Policy Act (NEPA) with the Department of Veterans Affairs as the federal lead agency. If federal funding is to be received, consultation would also be required for cultural resources in accordance with Section 106 of the National Historic Preservation Act.

The impacts of greenhouse gas emissions on global climate change were not yet recognized by the State of California at the time of the certification of the EIR in 1992 and, therefore, were not included in the analysis of impacts. Amendments to the State CEQA Guidelines requiring analysis of greenhouse gas emissions became effective on March 18, 2010. Therefore, this Addendum No. 1 to the EIR provides an assessment of the potential impacts of the refined project on greenhouse gas emissions.

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² *California Public Resources Code*, Division 13, Section 21002.1.

³ *California Code of Regulations*, Title 14, Chapter 3, Article 11, Section 15162.

⁴ *California Code of Regulations*, Title 14, Chapter 3, Article 11, Section 151624(a).

1.1 PURPOSE AND SCOPE OF THE ADDENDUM NO. 1 TO THE EIR

The County has prepared this Addendum No. 1 to the EIR to demonstrate that the refined project satisfies the requirements contained in Section 15164 of the State CEQA Guidelines for the use of an Addendum to an EIR and does not require the preparation of a Subsequent or Supplement to an EIR pursuant to Sections 15162 and 15163, respectively, of the State CEQA Guidelines due to the absence of new or substantially more adverse significant impacts than those analyzed in the certified 1992 EIR.⁵

This Addendum No. 1 to the EIR neither controls nor determines the ultimate decision for approval of the refinement of the approved project. The information presented in this Addendum No. 1 to the EIR will be considered by the County Board of Supervisors to make findings concerning the minor modifications to the certified 1992 EIR.⁶

⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

SECTION 2.0
PROJECT DESCRIPTION

Consistent with the requirements of Section 15124 of the State California Environmental Quality Act (CEQA) Guidelines,¹ this section of the Addendum No. 1 to the Rancho Los Amigos Medical Center Environmental Impact Report (EIR) certified in 1992 describes the proposed refinements to the North Campus Site Consolidation (refined project), including location and boundaries; existing conditions at the refined project site; a statement of the project objectives; and technical, economic, and environmental characteristics.²

2.1 PROJECT TITLE

North Campus Site Consolidation

2.2 LEAD AGENCY

County of Los Angeles
500 West Temple Street, Room 754
Los Angeles, California 90012
Attention: Chief Executive Office

2.3 PRIMARY CONTACT PERSON

Ms. Hannah Chen
County of Los Angeles Chief Executive Office
500 West Temple Street, Room 754
Los Angeles, California 90012
Telephone: (213) 974-2273
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2.4 PROJECT DESCRIPTION

The purpose of the refined project is to consolidate structures to comply with a more efficient strategy for providing critical health care services within severe resource constraints. The refined project recommends a reduction in capacity that requires more demolition and limits new construction to enable the consolidation of fewer licensed hospital beds in the remaining hospital facilities. In order to minimize operation losses, some programs, such as outpatient services, support services, research, education, and administration, would be consolidated. The hospital is currently licensed to serve 396 inpatient beds, but currently has 170 active beds on average and receives approximately 50,000 outpatient visits per year. The refined project would allow for the addition of up to 50 beds to the currently existing 150 beds in the Jacqueline Perry Institute (JPI) Building, while maintaining the current number of outpatient visitors per year. As a result of the consolidation, several buildings and modular structures would be vacated and demolished.

¹ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

As part of the refined project, the acute care service programs offered at Rancho Los Amigos would be housed in the JPI Building. Due to the fact that the JPI Building is not of sufficient size to house all of these programs, an approximately 56,000-square-foot, two- to three-story wing would be added to the existing JPI Building.⁴ In both the refined project and the approved project, the JPI Building would be the only Office of Statewide Health Planning and Development (OSHPD)-compliant acute care facility on the north campus. In addition, the refined project may include a Veteran Housing component within the project boundaries; however, this component would still fall within the maximum total development square footage cited in the certified EIR. This Addendum No. 1 to the EIR fully analyzes the environmental impacts of the inclusion of a Veteran Housing component in the project in order to account for maximum potential impacts from the implementation of the refined project.

The anticipated location for the refined project is in the north campus of Rancho Los Amigos. The refined project, as currently conceived, consists of renovation of existing buildings, totaling no more than 412,808 square feet. Renovation is expected to take place on some parts of existing buildings, including the JPI Building, the Support Services Annex (SSA) Kitchen, the Harriman Building, and the Central Utility Plant (Table 2.4-1, *Refined Project Components in the North Campus*). The refined project includes consolidation through demolition of non-OSHPD-compliant buildings, retention of the Safety Police Building (2,507 square feet) and Parking Structure (393,590 square feet), and relocation of the outpatient services for a total of 396,097 square feet (Table 2.4-1). In addition, the refined project includes construction of approximately 353,365 square feet of new buildings, including the approximately 56,000-square-foot JPI Building Expansion, approximately 122,000-square-foot Outpatient Facilities, and approximately 175,365-square-foot potential Veteran Housing (Table 2.4-1). In total, the refined project accounts for approximately 1,162,270 square feet of building space.⁵

⁴ County of Los Angeles Chief Executive Office and Department of Public Works. 15 June 2009. *Rancho Los Amigos Campus Plan*. Prepared by: Gensler, p.70.

⁵ The refined project accounts for approximately 1,162,270 square feet of total building space (no more than 412,808 square feet of renovation + approximately 353,365 square feet of new construction + approximately 2,507 square feet of the Safety Police Building to be retained + 393,590 square feet of the Parking Structure to be retained).

**TABLE 2.4-1
REFINED PROJECT COMPONENTS IN THE NORTH CAMPUS**

Project Elements	Building	Area (square feet)
Parts of existing buildings in portions to be renovated	JPI Building	236,645
	SSA Kitchen	67,072
	Harriman Building	75,815
	Central Utility Plant	33,276
Total (maximum)		412,808
Existing building to be retained	Safety Police Building	2,507
	Parking Structure	393,590
Total		396,097
Construction of new buildings	JPI Building Expansion	56,000
	Outpatient Facilities	122,000
	Veteran Housing	175,365
Total		353,365
Consolidation of buildings	/	/
Relocation of outpatient services	/	/
TOTAL BUILDING SPACE		1,162,270

SOURCE:

County of Los Angeles Chief Executive Office and Department of Public Works. 15 June 2009. *Rancho Los Amigos Campus Plan*, Executive Summary, Exhibit 1.3: North Campus Plan - Existing Buildings to Remain and to Remove. Prepared by: Gensler, p. 8.

The construction of new facilities and demolition of non-OSHPD-compliant buildings will be analyzed at the project level of detail. In order to reduce environmental impacts, the refined project has been designed in an effort to achieve silver certification in Leadership in Energy and Environmental Design by the U.S. Green Building Council, and it has also been designed in accordance with the County's *Low Impact Development Standards Manual* for the control of storm water runoff.⁸

In February 1992, the Rancho Los Amigos Medical Center Plan EIR was certified (SCH No. 91071053).⁹ In the certified EIR, approximately 356,000 square feet was approved for demolition,¹⁰ while the refined project proposes approximately 521,000 square feet for demolition. (Table 2.4-2, *Total Demolition and Building Space Associated with the Approved Project and Refined Project*). The approved project includes approximately 1,365,029 square feet of total building space, while the refined project accounts for approximately 1,162,270 square feet of building space (Table 2.4-2), which is 202,759 square feet less in building space than what has been approved in the certified EIR. As compared to the approved project, the refined project proposes more demolition but less built density than the approved project; therefore, the refined project would be a smaller facility than that analyzed in the certified EIR. This Addendum No. 1 to the EIR determined that the scope of impacts from the refined project, when compared to the approved project, would not result in new significant environmental impacts beyond those identified in the County's certified EIR, with the incorporation of existing mitigation measures from the certified EIR.

⁸ County of Los Angeles. January 2009. *Low Impact Development Standards Manual*. Available at: http://dpw.lacounty.gov/wmd/LA_County_LID_Manual.pdf

⁹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁰ Demolition numbers for the approved project were estimated based on the 2008 building areas.

**TABLE 2.4-2
TOTAL DEMOLITION AND BUILDING SPACE ASSOCIATED WITH THE
APPROVED PROJECT AND REFINED PROJECT**

	Approved Project		Refined Project	
	Demolition (square feet)	Building Space (square feet)	Demolition (square feet)	Building Space (square feet)
Area	356,000	1,365,029	521,000	1,162,270

JPI Expansion and Renovation

A 56,000-square-foot addition to the JPI Building (LACO No. A284) would accommodate additional acute care service facilities. The addition would be connected to the north side of the existing building (as indicated in the certified EIR) and would require demolition, grading, and new construction.¹¹ This project element also includes the renovation of the existing approximately 236,645 square feet of the JPI Building to accommodate various hospital functions. If the refined project is approved, construction would be anticipated to be completed as early as 2014 and as late as 2020.

SSA Kitchen Renovation

This element entails relocation of the kitchen from the south campus to the SSA (LACO No. X238), which would require renovation of the 67,072-square-foot SSA. Renovation began in 2008.

Harriman Building Renovation

Some administration, research, education, and support services would be relocated to the Harriman Building (LACO No. 1180), which would require renovation of the approximately 75,815-square-foot Harriman Building. Construction would be anticipated to be completed as early as 2014 and as late as 2020. Renovation of the Harriman Building, a historic resource, would be consistent with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.¹²

Demolition of Existing Vacant Buildings

This element of the refined project entails demolition of approximately 521,000 square feet of existing vacated buildings at the north campus (Table 2.4-2 and Figure 2.4-1, *North Campus Consolidation, Construction, and Renovation*). The areas where buildings have been demolished would be rough graded to maintain the existing drainage pattern on the site and hardscaped or landscaped to prevent erosion. The certified EIR allows for a maximum of 1,224 employees at any one time.¹³ The refined project will not exceed 1,224 employees at any one time. Demolition of vacated buildings would be anticipated to be completed as early as 2014 and as late as 2020.

¹¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹² Weeks, Kay D., and Anne E. Grimmer. 1995. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstruction Historic Buildings*. Washington, DC: U.S. Department of the Interior, National Park Service.

¹³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.



 **FIGURE 2.4-1**
North Campus Consolidation, Construction, and Renovation

Outpatient Facilities

This element of the refined project entails construction of approximately 122,000 square feet of Outpatient Facilities. The new Outpatient Facilities would house outpatient services relocated from the demolished buildings. Construction of the new Outpatient Facilities would be anticipated to be completed as early as 2014 and as late as 2020.

Veteran Housing

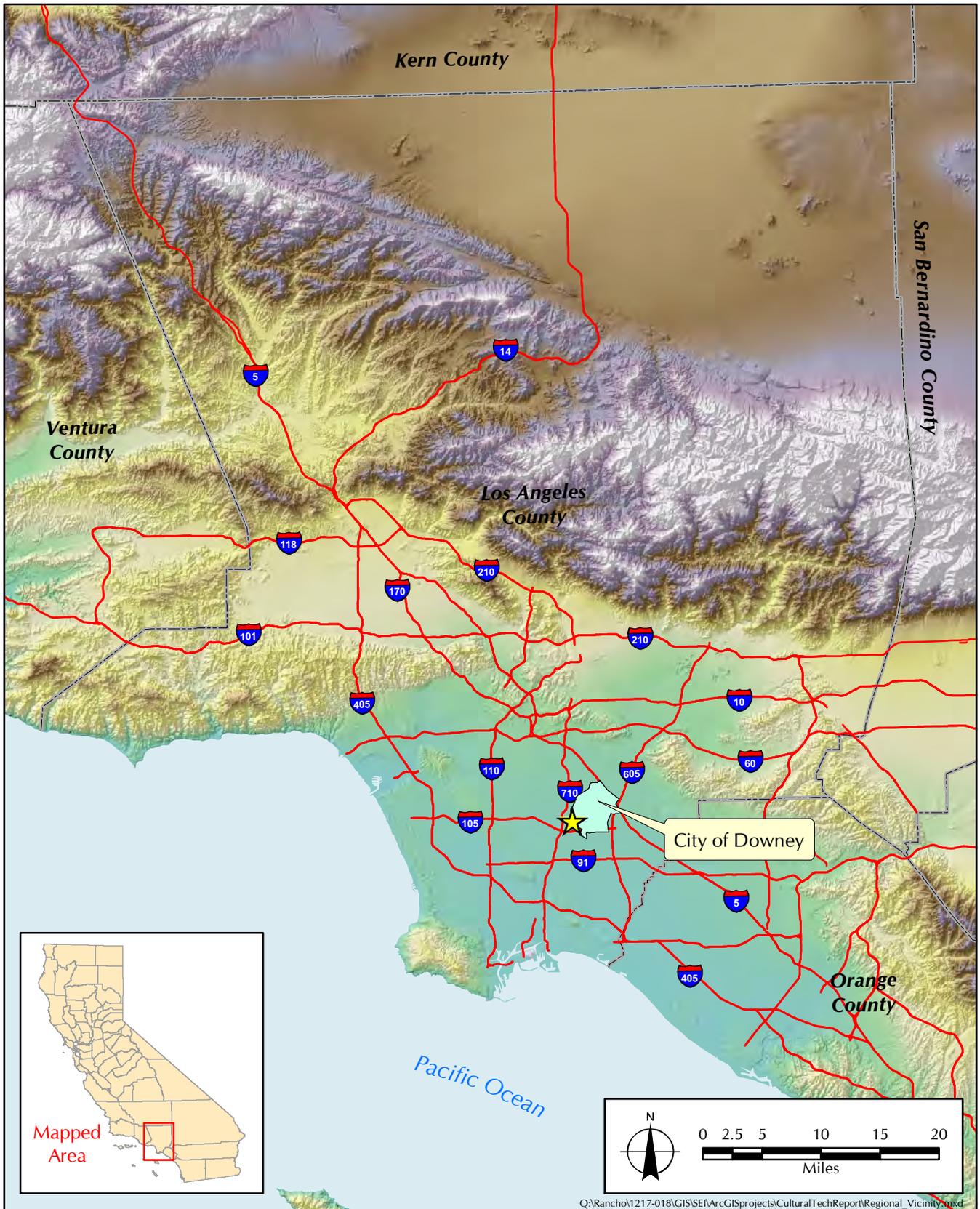
This potential element of the refined project may entail a long-term health care and residential facility for elderly and disabled veterans. The housing would be available for veterans who are residents of California, age 62 or older (or younger if disabled), and who have honorably served on active duty in the armed forces of the United States. The housing would include single rooms for individual veterans and double rooms for veteran-veteran couples or veterans and their spouses. Should the refined project involve Veteran Housing, it would be located within one or two newly constructed buildings in the southeast corner of the north campus, with a maximum combined size of 175,365 square feet. If federal funding is to be received for the Veteran Housing, prior to construction of the new Veteran Housing, the refined project would comply with the requirements of the National Environmental Policy Act (NEPA) and other applicable statutes, including, but not limited to, Section 106 of the National Historic Preservation Act. Alternatively, if federal funding is not received, the building(s) could be used for a similar purpose, such as senior housing and/or an extended-stay hotel.

2.5 PROPOSED LOCATION

The refined project site is contained within the north campus of Rancho Los Amigos, located at 7601 East Imperial Highway, within the western edge of the City of Downey (City), County of Los Angeles (County), California (Figure 2.5-1, *Regional Vicinity Map*). The refined project site is located approximately 1 mile east of U.S. Interstate 710 (Long Beach Freeway), 1 mile north of U.S. Interstate 105, 3 miles west of U.S. Interstate 605 (San Gabriel River Freeway), and 3.3 miles southwest of U.S. Interstate 5 (Golden State Freeway). The refined project site is bound by Quill Drive to the north, Rives Avenue to the east, Imperial Highway to the south, and Old River School Road to the west (Figure 2.5-2, *Refined Project Vicinity Map*). The refined project site is located southeast of Los Amigos Golf Course and approximately 1.7 miles southeast of the Downey Civic Center, approximately 5.3 miles northeast of the Compton/Woodley Airport, and approximately 7.1 miles north-northeast of the Long Beach Municipal Airport.

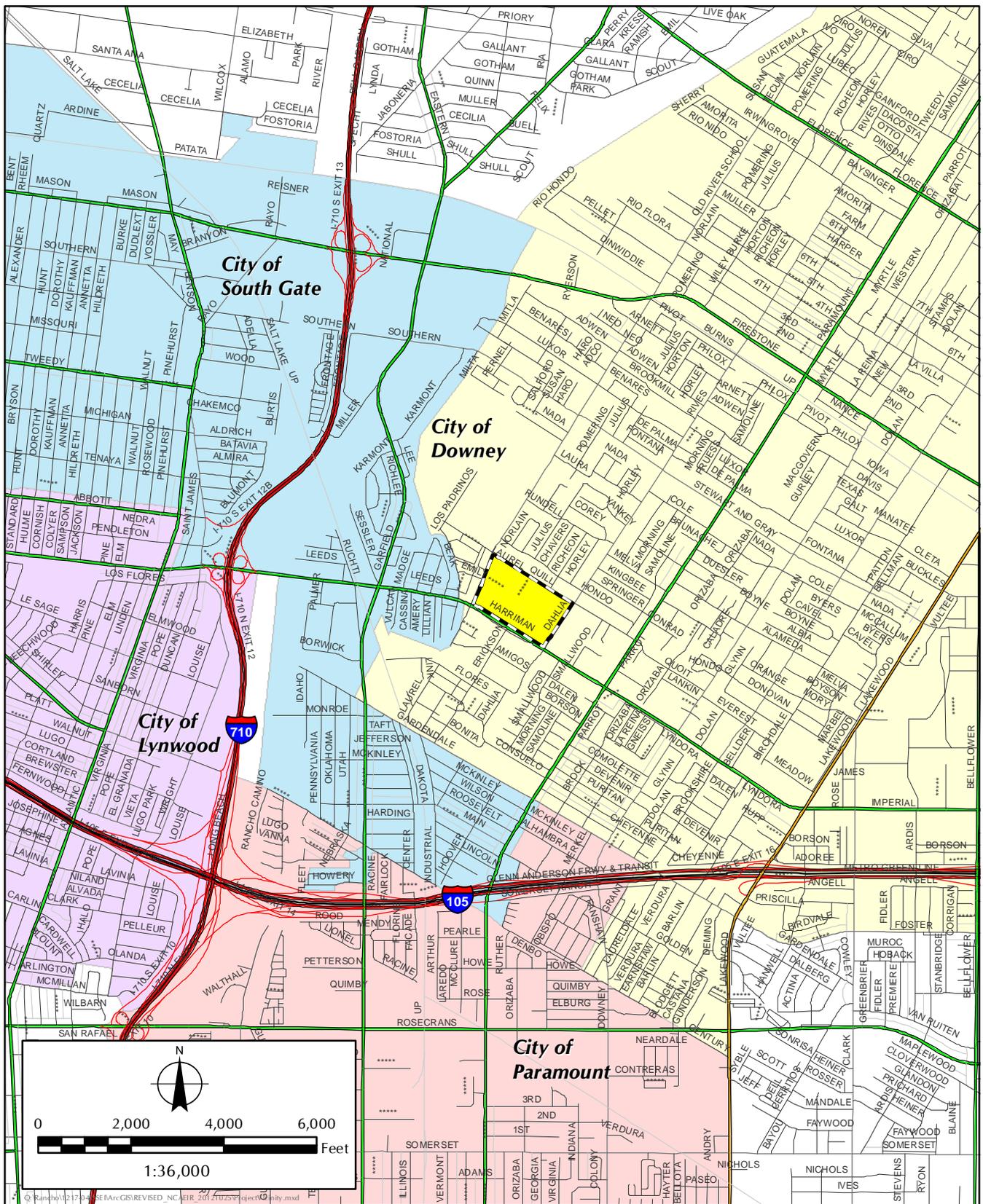
The refined project site is located within the U.S. Geological Survey (USGS) 7.5-minute series, South Gate, California, topographic quadrangle, in the southwest portion of the Santa Gertrudes (McFarland and Downey) Land Grant Boundary (Figure 2.5-3, *Topographic Map*).¹⁴ The elevation of the refined project site ranges from 96 feet above mean sea level (MSL) near the intersection of Old River School Road and Imperial Highway to the southwest to approximately 100 feet above MSL near the intersection of Quill Drive and Rives Avenue to the northeast. The County has owned and operated the refined project site since the 1880s, when it was established as a tuberculosis sanitarium and residence for the impoverished.

¹⁴ U.S. Geological Survey. [1964] Photorevised 1981. *7.5-minute Series, South Gate, California, Topographic Quadrangle*. Reston, VA.



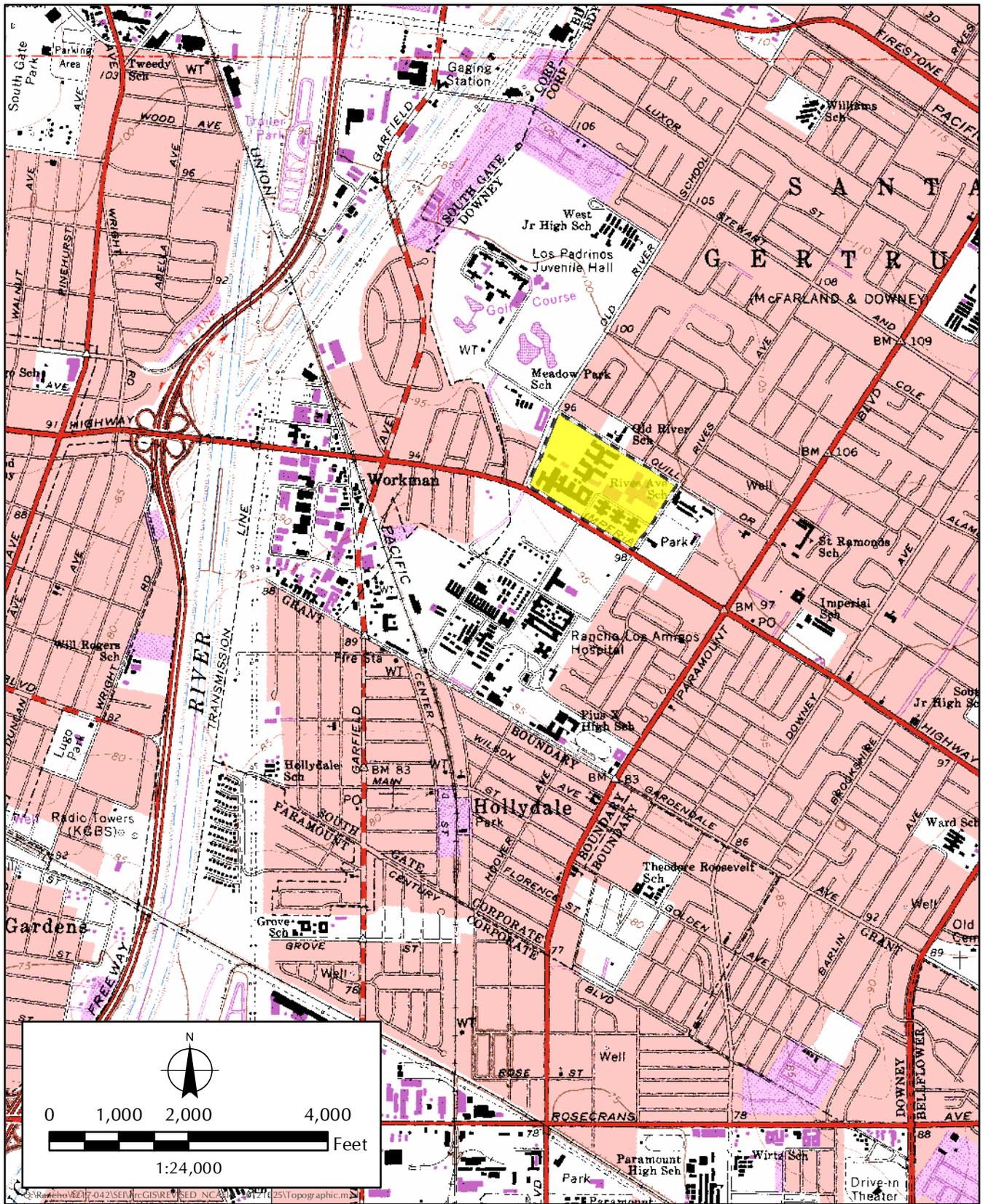
★ Refined Project Location

FIGURE 2.5-1
Regional Vicinity Map



Refined Project Area

FIGURE 2.5-2
Refined Project Vicinity Map



Refined Project Area

FIGURE 2.5-3
Topographic Map

2.6 PROPOSED SPONSOR

County of Los Angeles Chief Executive Office
500 West Temple Street, Room 754
Los Angeles, California 90012
Telephone: (213) 974-2273
Fax: (213) 626-7827

2.7 GENERAL PLAN LAND USE DESIGNATION

The north campus is completely built out and used exclusively for hospital and medical-related purposes. The refined project site is located within the County; therefore, development in the area is governed by the policies, procedures, and standards set forth in the County General Plan, which is currently being updated.¹⁵ The Land Use Policy map in the County General Plan describes dominant land use characteristics within the County and provides a policy framework for developing area-wide, community, and neighborhood plans.¹⁶ The refined project site has been designated as Public and Semi-public Facilities in the County General Plan.¹⁷ In reference to the refined project boundary being contained within the City, but owned by the County, the Downey Vision 2025 General Plan designates the entire north campus as Public, which is intended for areas to be occupied by public agencies as facilities that support community services, excluding schools and parks.¹⁸ This designation includes the Rancho Los Amigos Medical Center. The refined project would be developed with medical inpatient and outpatient buildings and appurtenant facilities consistent with the “public and semi-public facilities” land use designation. Prior to the start of construction, the County will submit the refined project to the City in accordance with and subject to California Government Code Section 65402(b).

2.8 ZONING

The refined project site is zoned as “public and semi-public facilities,” according to the County General Plan. The designation allows for “major existing and proposed public and semi-public uses, including airports and other major transportation facilities, solid and liquid waste disposal sites, utilities, public buildings, public and private educational institutions, religious institutions, hospitals, detention facilities, and fairgrounds.” The City zoning designation for the north campus is Residential, R-1-5,000. R-1-5,000 is a single-family residential zone requiring a 5,000-square-foot-minimum lot size.¹⁹ The refined project conforms to the County Zoning Ordinance.

¹⁵ County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

¹⁶ County of Los Angeles Department of Regional Planning. Revised 30 June 1988. *County of Los Angeles General Plan, Land Use Policy Map*. Los Angeles, CA.

¹⁷ County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

¹⁸ City of Downey Planning Division. Adopted 25 January 2005. *Downey Vision 2025 General Plan*. Available at: http://www.downeyca.org/city_planning_gp.php

¹⁹ City of Downey Community Development Department. Adopted 28 October 2008. *City of Downey Zoning Ordinance*. Available at: <http://qcode.us/codes/downey/>

2.9 EXISTING CONDITIONS

The refined project site is located in the Downey Plain section of the Los Angeles Basin. The Downey Plain is situated in the central portion of the Los Angeles Basin and is underlain by several thousand feet of alluvial sediments associated with the San Gabriel River drainage. The alluvium is underlain at a depth of several thousand feet by marine and non-marine sedimentary rocks of Tertiary age. Soils underlying the refined project site are classified as Urban Land, indicating that they have been previously disturbed. The permeability of this type of soil is highly variable but moderate to moderately slow.

The nearest body of surface water to the refined project site is the San Gabriel River, located 0.5 mile to the west. Water service for the north campus is provided by the Rancho Water System, which is currently owned and operated by the County. Water sources consist of three on-site wells and one service connection.

- Powerhouse Well (PH) drilled in 1931
- Dairy Well No. 1 (DW#1) drilled in 1927
- Dairy Well No. 2 (DW#2) drilled in 1955
- 10-inch service connection to Metropolitan Water District (MWD) located at the intersection of Stewart and Gray Road and Old River School Road

The well water is the main source of water, with MWD service used for backup only.

Wastewater generated at the north campus discharges into the County Sanitation Districts' Old River School Road trunk sewer located at Old River School Road between Quill Drive and Imperial Highway.

The refined project site is located on the north campus in the City, which can be described as an urban community, built out with low- and medium-density residential and commercial land uses. The City of South Gate is adjacent to the refined project site on the west. The Long Beach Freeway and the Union Pacific right-of-way are nearby to the west and southwest. The adjacent land uses consist of single-family residential dwellings to the north, Apollo Park to the east, the Downey Courthouse (Superior Court) and a County library to the south (immediately across East Imperial Highway), and multifamily residential dwellings to the west.

The 49-acre north campus is completely built out and used exclusively for hospital and medical-related functions. The north campus contains 24 buildings, several of which occur as clusters, that house inpatient and outpatient facilities and related hospital services (Table 2.9-1, *Description of Existing Buildings*). The exterior finishes of the structures at the north campus generally consist of stucco, wood siding, and formed concrete.

**TABLE 2.9-1
DESCRIPTION OF EXISTING BUILDINGS**

LACO No.	Building	Description
5082	100s Building (Clinic Building)	Built in 1963, and expanded in 1977, this building is an irregularly shaped, 123,770-square-foot, two-story structure with a basement. The activities and services that occur in this building consist of radiology, central clinic, phlebotomy, ambulatory care, children's services, communications, surgery, anesthesia, urology, audiology, vascular laboratory, physical therapy, patient case management, housekeeping, echo cardiology, electrocardiogram (EKG), electroencephalogram (EEG), psychology, physicians' offices, central supply, blood bank equipment, intensive care unit, nuclear medicine, and dietary care.
1180	400s Building (Harriman Building)	Built in 1930, this building is a rectangular, 75,815-square-foot, two-story structure. The activities and services that occur in this building consist of patient case management, department of surgery, medical director's office, dental clinic, administration, physicians' offices, nursing department, department of medicine, occupational/physical therapy, communication disorder, infection control, information systems, microbiology, psychology, and spinal cord treatment.
3385	500s Building	Built in 1952, this building is an irregularly shaped, 88,421-square-foot, one-story structure. The activities and services that occur in this building consist of orthodontics, respiratory therapy, facility management, mail room, environmental services, human resources, dietary services, nuclear medicine, and X-ray files.
1993 & 1145	Rehabilitating Engineering Center (two buildings)	The approximately 1,000-square-foot Project Threshold structure (LACO No. 1993) and the approximately 1,656-square-foot Model Home (LACO No. 1145) are part of the Rehabilitating Engineering Center's programs in which patients awaiting discharge can learn to adapt to independent living.
5515	Carpenter's Shop	This building is a 1,800-square-foot structure.
2890, 2891, 2892, & 0859	600s Building	Built in 1949, these buildings are H-shaped, one-story, freestanding structures that measure 43,702 square feet in total. The activities and services that occur in these buildings consist of a gift shop, medical records, patient financial services, plant maintenance, audiology, thrift shop, social work, and housekeeping.
1992 & 4943	600s Buildings Additions (two buildings)	The 1,029-square-foot Storage Building (LACO No. 1992) and the approximately 1,340-square-foot HUT Building (LACO No. 4943; previously known as Shelter) were added to Buildings 601-604.
4627 & 5039	700s Building	Built in 1960, this building is an irregularly shaped, 63,012-square-foot, one-story structure. The activities and services that occur in this building consist of nursing (patient ward), environmental services, occupational health, recreational therapy, and finance.
4848	800s Building	This building is an irregularly shaped, 61,770-square-foot, one-story structure. The activities and services that occur in this building consist of information systems, LAREI, adult day care, nursing facility, pathokinesiology, wheel-chair sports, nurse facilities and training, and housekeeping.

**TABLE 2.9-1
DESCRIPTION OF EXISTING BUILDINGS, Continued**

LACO No.	Building	Description
5357	900s Building	Built in 1966, this building is an irregularly shaped, 81,260-square-foot, one-story structure. The activities and services that occur in this building consist of the Downey Unified School District, physical therapy, occupational therapy, recreational therapy, patient case management, physicians offices, psychology, speech pathology, nurse education, social work, dietary services, and housekeeping.
0138 & 0139	Annex West (Building 800A) and Annex East (Building 800B)	These buildings are rectangular, 5,760-square-foot, one-story structures. These buildings are dedicated to gerontology.
0140	Building 900A	Built in 1985, this trailer is a portable, rectangular, 5,760-square-foot structure. The activities and services that occur in this building consist of admissions and LAREI.
0141	Building 900B	Built in 1987, this trailer is a portable, rectangular, 5,760-square-foot structure. This building is dedicated to vocational rehabilitation.
0137	Center for Applied Rehabilitation Technology (CART)	Built in 1990, the CART building is an irregularly shaped, 5,760-square-foot, one-story structure.
X209	Power Plant (also known as Central Plant)	Built in 1993, the 33,276-square-foot central plant for the hospital is located in the northwest portion of the north campus. This plant supplies emergency backup power provided by several diesel generators and water treatment for hospital operations.
A284	JPI Building	Built in 1993, the JPI Building is an irregularly shaped, 236,645-square-foot, three-story structure with a basement. The activities and services that occur in this building consist of facilities management, environmental services, laundry, materials management, respiratory therapy, pathology lab, information systems, patient units, offices and storage, and medical records maintenance.
5048	Medical Science Building	Built in 1962, this building is an irregularly shaped, 23,093-square-foot, one-story structure that is dedicated to LAREI.
0145	MRI Building	Built in 1993, this building is an irregularly shaped, 1,830-square-foot, one-story structure that is dedicated to magnetic resonance imaging (MRI).
L796	Parking Structure	Built in 1993, the parking structure is an irregularly shaped, 393,590-square-foot structure. The 6,000-square-foot facility management storage area is located in this structure. The structure currently has approximately 1,109 parking spaces.
X239	Safety Police Office	Built in 1993, this office is an irregularly shaped, 2,507-square-foot, one-story structure. This office is attached to the parking structure.

**TABLE 2.9-1
DESCRIPTION OF EXISTING BUILDINGS, Continued**

LACO No.	Building	Description
X238	SSA	Built in 1993, this annex is a rectangular, 67,072-square-foot, two-story structure. The activities and services that occur in this building consist of medical library, education media, building crafts, dietary services, marketing, communication, finance, environmental services, billing, document review, information systems, and conference rooms.

NOTE: The current square footage data for the buildings on the north campus differs slightly from the square footage reported in the certified EIR due to the fact that certain buildings have been modified since 1992.

The refined project site does not lie within a historic district.²⁰ One building at the refined project site, the Harriman Building (LACO No. 1180), appears eligible for listing in the California Register of Historic Places (CRHR) and the National Register of Historic Places (NRHP).²¹

The refined project would entail demolition of numerous structures, resulting in alterations to the existing baseline conditions.

Hazardous wastes are present on the north campus and stored in a locked metal structure located immediately north of the central plant. This storage structure provides secondary containment in the event of spills or leaks. Typical wastes include, but are not limited to, oil, acid, batteries, mercuric chloride, formaldehyde, lead acetate, paints, packaging materials, photo chemicals, gloves, and masks. The equivalent of approximately three to four 55-gallon drums of waste materials is disposed of every quarter.

Asbestos-containing materials (ACMs) are present on the north campus and stored in a separate, locked wooden container adjacent to the hazardous waste structure. At the time of the site inspection, one bag of asbestos-containing floor tile (less than 5 pounds) was stored in this container. All hazardous wastes generated by the hospital are to be transported off-site for disposal by licensed hazardous waste haulers. Trucks carrying hazardous materials shall be required to operate in accordance with the City's hazardous materials routes and transportation restrictions.²²

2.10 STATEMENT OF OBJECTIVES

Rancho Los Amigos is a renowned public health care facility, ranking among the nation's top 10 rehabilitation centers. Its team of highly qualified rehabilitation experts blends unmatched experience with the latest technologies, which has led to many important advances in the art and science of rehabilitation medicine. Rancho Los Amigos Center performs a critical function in meeting the nation's medical needs. However, due to continuing local resource constraints that have resulted in the closure of numerous regional hospitals and clinics, coupled with a continuing desire to improve the operational efficiency of Rancho Los Amigos, the County is undertaking the refined project in order to move all medical facilities and services from the south campus area to

²⁰ Historic Resources Group. 26 July 1995. *Primary Record and District Record: Rancho Los Amigos Medical Center*. Submitted to: Office of Historic Preservation, Department of Parks and Recreation, Sacramento, CA.

²¹ Kaplan Chen Kaplan. September 2004. *Rancho Los Amigos National Rehabilitation Center North Campus Historic Resources Evaluation*. Santa Monica, CA.

²² City of Downey Planning Division. Adopted 25 January 2005. "Chapter 2. Circulation Chapter." In *Downey Vision 2025 General Plan*. Downey, CA. Available at: http://www.downeyca.org/city_planning_gp.php

the smaller north campus area and consolidated structures, thereby providing a cost-effective medical facility. The refined project would enable the County to focus the medical services activities within and around the JPI Building.

Goal

The County is committed to reducing the operating costs for Rancho Los Amigos and providing each patient with superior medical and rehabilitation services in a culturally sensitive environment.

Objectives

The County has identified and prioritized six basic objectives that are important to achieving the project goal:

- Consolidate inpatient and outpatient services in dedicated buildings to optimize operational effectiveness while reducing operations and maintenance costs.
 - Comply with the regulations developed by the OSHPD as mandated by Senate Bill 1953 (Chapter 740, 1994), an amendment to and furtherance of the Alfred E. Alquist Hospital Seismic Safety Act of 1983.
 - Reduce operating costs to achieve greater efficiency while maintaining the status of Rancho Los Amigos as a national leader in rehabilitative care.
- Reduce the number of licensed beds from 396 to approximately 200 to improve the operational efficiency of Rancho Los Amigos while maintaining its role in the County's health care system.
- Maintain nationally recognized level of service of rehabilitation treatment modalities.
- Provide approximately 122,000 square feet of outpatient facilities to accommodate the approximately 50,000 outpatient visits per year consistent with the Space Program Assessment.
- Implement the County Energy and Environmental Policy by incorporating sustainable design criteria for water efficiency, energy efficiency, and indoor air quality.
- Ensure that new construction will enhance visual aesthetics by complementing the surrounding community and conserving the historic elements of the project area.

2.11 CONSTRUCTION SCENARIO

The construction scenario describes the timeline anticipated to prepare the refined project site and build the refined project, and the associated equipment type and number expected to be utilized to complete construction.

Project consolidation would occur either concurrently or in two phases: Phase I would consist of demolition of existing buildings, construction of approximately 122,000 square feet of Outpatient Facilities, and renovation of the SSA Kitchen. Phase II would consist of the JPI Building Expansion renovation and the Harriman Building renovation and construction of the potential Veteran Housing, and would be anticipated to be completed as early as 2014 and as late as 2020. The environmental analysis is based on the construction equipment and construction crew vehicles projected for each of the phases. Unless specifically noted, the equipment and/or vehicles are anticipated to be used on-site for the duration of the schedule.

Construction equipment would be equipped with state-of-the-art noise-muffling devices. To meet noise standards, barriers/curtains would be utilized during construction. The barriers/curtains would be used to shield the equipment from the receiver of noise. The height and length of the barrier/curtain shall be determined based on location of demolition/construction and receiver.

Construction equipment would be turned off when not in use. The construction contractor would ensure that all construction and grading equipment is properly maintained. All vehicles and compressors would utilize exhaust mufflers and engine enclosure covers (as designed by the manufacturer) at all times.

Work would be expected to be largely undertaken in previously engineered fill materials. If site-specific geotechnical investigations result in a determination of the need to encroach on native soils, such excavations shall be monitored by a qualified archeologists. Paleontological construction monitoring and recovery of paleontological resources from the grading sites would be required in accordance with standards for such recovery established by the Society of Vertebrate Paleontology such that potential for significant impacts to paleontological resources through the inadvertent loss of important scientific information would be avoided. The recommended procedure to be followed in the event of an accidental discovery of archaeological resources during construction includes stoppage of work on the site of the discovery, immediate evaluation of the find by a qualified archaeologist, and, if warranted, excavation and recovery of significant archaeological resources. In accordance with Health and Safety Code Sections 7050 and 7052, in the event of the discovery of human remains outside of a dedicated cemetery, all ground disturbance would cease and the County Coroner would be notified. Furthermore, in accordance with the Public Resources Code, Section 5097.98, the Native American Heritage Commission would be notified in the event that the County Coroner determines that the remains are Native American.

2.11.1 Phase I

During Phase I, existing vacated buildings would be demolished. Approximately 122,000 square feet of Outpatient Facilities would be constructed to house the outpatient services relocated from the demolished buildings. Phase I would incorporate the consolidation of the programming and demolition of approximately 521,000 square feet of existing buildings around the north campus. Phase I would also include the SSA Kitchen renovation. The time frame for demolition of the existing buildings would be approximately 32 weeks (Table 2.11.1-1, *Equipment List: Phase I, Demolition*).

**TABLE 2.11.1-1
EQUIPMENT LIST: PHASE I, DEMOLITION**

Quantity (approximate)	Type of Equipment/Vehicle	Duration of On-site Construction Activity (weeks)	Total Number of Trips to/from Site during Construction (trips)
1	Water trucks	8	6
1	Hydraulic crane	10	3
4	Dump trucks	26	240
4	Graders/dozers for earthwork and demolition	8	4
6	Demolition crews (four-man crews)	26	675
40	Crew vehicles	30	5,196

The environmental analysis has been completed based on the assumption that new construction would take 36 months, which is a reasonable worst-case scenario (Table 2.11.1-2, *Equipment List: Phase I, New Construction*). However, construction of the outpatient facilities may take as long as five years.

**TABLE 2.11.1-2
EQUIPMENT LIST: PHASE I, NEW CONSTRUCTION**

Quantity (approximate)	Type of Equipment/Vehicle	Duration of On-Site Construction Activity (weeks)	Total Number of Trips to/from Site during Construction (trips)
1	Water trucks	10	2
2	Graders/dozers for earthwork and demolition	12	2
2	Hydraulic crane	24	6
4	Dump trucks	154	2,667
10	Material deliveries	80	465
12	Cement trucks	20	1,039
65	Crew vehicles	130	36,588

2.11.2 Phase II

Phase II of the refined project consists of the construction, operation, and maintenance of the 56,000-square-foot JPI Building Expansion and the Harriman Building renovation.

Phase II also includes renovation of the existing JPI Building to accommodate various hospital functions. It is anticipated that this phase would be completed in 24 months, which is a reasonable worst-case scenario (Table 2.11.2-1, *Equipment List: Phase II*). However, construction may take as long as four years.

**TABLE 2.11.2-1
EQUIPMENT LIST: PHASE II**

Quantity (approximate)	Type of Equipment/Vehicle	Duration of On-Site Construction Activity(weeks)	Total Number of Trips to/from Site during Construction (trips)
1	Water trucks	8	16
2	Graders/dozers for earthwork and demolition	8	2
2	Hydraulic crane	24	2
4	Demolition crews (four-man crews)	12	208
5	Dump trucks	12	180
8	Concrete trucks	20	266
75	Crew vehicles	96	31,175

SECTION 3.0

ENVIRONMENTAL ANALYSIS

The environmental analysis provided in this section describes the information that was considered in evaluating the questions contained in the Environmental Checklist of the State California Environmental Quality Act Guidelines.¹ The information used in this evaluation is derived from the literature review (see Section 4.0, *References*, for a list of reference material consulted), field reconnaissance, and meetings with the County of Los Angeles Department of Public Works and the County of Los Angeles Chief Executive Office. The evaluation of direct, indirect, and cumulative impacts considered the existing conditions within the North Campus Site Consolidation refined project site, immediately adjacent property within the north campus, and the surrounding City of Downey.

¹ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

3.1 AESTHETICS

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to aesthetics from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Aesthetics at the refined project site were evaluated with regard to the California Department of Transportation (Caltrans) Scenic Highway Program designations; previously published information regarding the visual character of the refined project site, including light and glare; site reconnaissance; and a review of conceptual elevations and site plans.²

The potential for the refined project to result in new or substantially more adverse significant impacts to aesthetics compared to the approved project was evaluated in relation to four questions recommended for consideration by the State California Environmental Quality Act Guidelines:³

Would the refined project:

- (a) Have a substantial adverse effect on a scenic vista?

The refined project would not be expected to result in new or substantially more adverse significant impacts on a scenic vista from those disclosed in the certified EIR.⁴ The refined project would affect the same area analyzed in the certified EIR.⁵ As with the approved project, the refined project would not be located within the viewshed of a California Scenic Highway designated by the Caltrans Office of State Landscape Architecture⁶ or an All-American Road or National Scenic Byway as designated by the U.S. Department of Transportation, Federal Highway Administration.⁷ The Los Angeles County Regional Recreation Areas Plan identifies scenic vistas as vista points that are “areas that command a panoramic and in most cases spectacular view by virtue of elevation differential and relative freedom from visual obstructions.”⁸ The refined project area is not located in the vicinity of a scenic vista as designated by the County of Los Angeles (County). Although not subject to the Downey Vision 2025 General Plan (Downey Vision 2025), the County reviewed Downey Vision 2025 and determined that the refined project would not adversely affect or obstruct the view of any scenic vista designated by the City of Downey (City). The proposed two- to three-story, 56,000-square-foot addition on the north side of the Jacquelin Perry Institute (JPI); two- to three-story, 122,000-square-foot Outpatient Facilities; and potential two- to four-story

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² California Department of Transportation. Accessed 22 June 2011. “Eligible (E) and Officially Designated (OD) Routes.” California Scenic Highway Program. Available at: <http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm>

³ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

⁴ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁶ California Department of Transportation. Accessed 22 June 2011. “Eligible (E) and Officially Designated (OD) Routes.” California Scenic Highway Program. Available at: <http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm>

⁷ U.S. Department of Transportation, Federal Highway Administration. Accessed 23 June 2011. “America’s Byways.” National Scenic Byways Program. Available at: http://www.byways.org/explore/byways/#index_C

⁸ County of Los Angeles Regional Planning Commission. 29 July 1965.. *Los Angeles County Regional Recreation Areas Plan: A Part of the Recreation Element of the General Plan*. Los Angeles, CA.

175,365-square-foot Veteran Housing would not exceed proposed building heights as previously evaluated by the 1992 certified EIR⁹ and would not exceed the height of surrounding buildings. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to aesthetics related to substantial adverse effects to scenic vistas.

- (b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The refined project would not be expected to create a new or substantially more adverse significant impact on scenic resources within a state-designated scenic highway from that disclosed in the certified EIR. The refined project would affect the same area analyzed in the certified EIR.¹⁰ According to the California Scenic Highway Program, the nearest eligible or officially designated scenic highway or historic parkway is Interstate 110 approximately 14 miles north of the refined project site. Interstate 110 begins as a historic parkway in the City of Pasadena and travels southwest approximately 25 miles to terminate near downtown Los Angeles.¹¹ The nearest officially designated scenic highway is a portion of State Route 1 (Pacific Coast Highway) located to the south in the City of Long Beach approximately 15 miles from the refined project site. Therefore, there would be no eligible or officially designated scenic highways traversing or adjacent to the refined project area. The refined project site cannot be viewed from either of these highways due to distance. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to aesthetics related to substantial damage to scenic resources within a state scenic highway.

- (c) Substantially degrade the existing visual character or quality of the site and its surroundings?

The refined project would not be expected to create a new or substantially more adverse significant impact to aesthetics related to the substantial degradation of the existing visual character of the refined project site and its surroundings from that disclosed in the certified EIR.¹² As with the approved project, the construction phase of the refined project may have a temporary adverse effect on the existing visual quality of the site and its surroundings due to the demolition, soil disturbance, waste debris generation, and security barriers required during the construction activities. However, it is anticipated that the potential impacts and short-term nature of the degradation of the visual character of the neighborhood would be less than significant.

The refined project has been designed to improve the existing aesthetic character of the site by demolishing approximately 521,000 square feet of vacated building space and constructing a two- to three-story, 56,000-square-foot addition to the north side of the JPI Building; a new two- to three-story 122,000-square-foot Outpatient Facilities, and a potential two- to four-story, 175,365-square-foot Veteran Housing. The refined project would not be expected to displace or degrade the visual

⁹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁰ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹¹ California Department of Transportation. Accessed 23 June 2011. "Eligible (E) and Officially Designated (OD) Routes." California Scenic Highway Program. Available at: <http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm>

¹² County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

character of the refined project site and its surroundings, but would instead contribute to a visual improvement. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to aesthetics related to degradation of the existing visual character of the refined project site and its surroundings.

- (d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The refined project would not be expected to create a new or substantially more adverse significant impact to aesthetics related to the creation of a new source of substantial light or glare that would adversely affect day or nighttime views in the refined project area from that disclosed in the certified EIR. The refined project would affect the same area analyzed in the certified EIR.¹³ Due to the existing high level of light and glare in the refined project vicinity and the nonreflective nature of the proposed building materials, new sources of light and glare resulting from implementation of the refined project would not be considered a substantial increase.

The refined project would be located in the City within the Los Angeles Basin, which currently experiences a high level of day and nighttime light and glare due to the high density of urban development. Current on-site sources of light and glare include the JPI Building and security and landscape lighting. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to aesthetics related to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

¹³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

3.2 AGRICULTURAL AND FOREST RESOURCES

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to agricultural and forest resources from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Agricultural and forest resources at the refined project site were evaluated with regard to the California Department of Conservation's (CDC's) Farmland Mapping and Monitoring Program (FMMP),² the County of Los Angeles General Plan,³ and Downey Vision 2025 General Plan (Downey Vision 2025).⁴

The State California Environmental Quality Act (CEQA) Guidelines (§21060.1(a) Public Resources Code 21000-21177) define agricultural land to mean "prime farmland, farmland of statewide importance, or unique farmland, as defined by the United States Department of Agriculture land inventory and monitoring criteria, as modified for California," and is herein collectively referred to as Farmland. Public Resources Code section 12220(g) defines forest land as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."

The potential for the refined project to result in new or substantially more adverse significant impacts to agricultural and forest resources was evaluated in relation to five questions recommended for consideration by the State CEQA Guidelines:⁵

Would the refined project:

- (a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The refined project would not be expected to result in new or substantially more adverse significant impacts to agricultural and forest resources in relation to the conversion of Farmland from those disclosed in the certified EIR. The refined project would affect the same area analyzed in the certified EIR.⁶ The County of Los Angeles (County) General Plan designates the entire proposed project site as Public and Semi-Public Facilities.^{7,8} This land use designation is intended

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. 2004. *Important Farmland in California, 2002*. Sacramento, CA.

³ County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

⁴ City of Downey Planning Department. Adopted 25 January 2005. *Downey Vision 2025 General Plan*. Available at: http://www.downeyca.org/gov/cd/planning/general_plan_n_map/default.asp.

⁵ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁷ County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

for major existing and proposed public and semipublic uses, including airports and other major transportation facilities, solid and liquid waste disposal sites, utilities, public buildings, public and private educational institutions, religious institutions, hospitals, detention facilities, and fairgrounds.⁹ Although not subject to the requirements of Downey Vision 2025, the City of Downey (City) designates the north campus of Rancho Los Amigos as a public land use, which is intended for areas to be occupied by public agencies as facilities that support community services, excluding schools and parks.¹⁰ This designation includes the Rancho Los Amigos Medical Center. The most recent mapping of the County undertaken by the CDC FMMP was reviewed for the refined project site.¹² Based on the review of the land use designations and the applicable FMMP Important Farmland Map for the refined project site, there are no Farmlands located in or immediately adjacent to the refined project site. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to agricultural and forest resources related to the conversion of Farmland.

(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

The refined project would not be expected to result in new or substantially more adverse significant impacts to agricultural and forest resources in relation to a conflict with existing zoning for agricultural use or a Williamson Act contract from those disclosed in the certified EIR.¹³ The refined project would affect the same area analyzed in the certified EIR.¹⁴ Based on a review of Downey Vision 2025, there is no agricultural land use zoned within the City's jurisdiction.¹⁵ The County does not currently offer Williamson Act contracts, so no Williamson Act contracts are located in the City or in adjacent properties.¹⁶ Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to agricultural and forest resources related to a conflict with existing zoning for agricultural use or a Williamson Act contract.

⁸ County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles Land Use Policy Map*. Los Angeles, CA. Available at: http://planning.lacounty.gov/assets/upl/project/gp_web80-land-use-policy-map-5.pdf

⁹ County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

¹⁰ City of Downey Planning Department. Adopted 25 January 2005. *Downey Vision 2025*. Available at: http://www.downeyca.org/gov/cd/planning/general_plan_n_map/default.asp

¹² California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. 2004. *Important Farmland in California, 2002*. Sacramento, CA.

¹³ A Williamson Act contract prevents premature and unnecessary conversion of agricultural and open space lands to urban uses, as enforced by the Williamson Act of 1965.

¹⁴ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁵ City of Downey Planning Division. Adopted 25 January 2005. *Downey Vision 2025*. Available at: http://www.downeyca.org/gov/cd/planning/general_plan_n_map/default.asp

¹⁶ State of California Department of Conservation. Accessed 20 June 2011. Web site. Available at: http://www.consrv.ca.gov/dlrp/lca/basic_contract_provisions/Pages/index.aspx

- (c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The refined project would not be expected to result in new or substantially more adverse significant impacts to forest resources, in relation to the potential to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by the Government Code section 51104(g)). As noted above, the Public Resources Code section 12220(g) defines forest land as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.” Public Resources Code section 4526 states,

“Timberland” means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis after consultation with the district committees and others.¹⁷

Government Code section 51104 (g) states,

“Timberland production zone” or “TPZ” means an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the general plans of cities and counties, “timberland preserve zone” means “timberland production zone.”¹⁸

Sections 51112 and 51113 relate to timberland production within timberland production zones.¹⁹ Finally, subdivision (h) states, a “‘compatible use’ is any use which does not significantly detract from the use of the property for, or inhibit, growing and harvesting timber” and provides six specific instances where such uses would be “‘contrary’ or inconsistent with the land being considered a ‘compatible use.’”²⁰

According to the Department of Forestry and Fire Protection, the State of California consists of approximately 5,418,979 acres of land that has been classified as TPZ.²¹ TPZ is designated in 32

¹⁷ *California Public Resources Code*, Section 4526.

¹⁸ *California Government Code*, Article 1, General Provisions, Sections 51100–51104; Section 51104 (g).

¹⁹ *California Government Code*, Article 2, Timberland Production Zones, Sections 51110–51119.5; Sections 51112–51113.

²⁰ *California Government Code*, Article 1, General Provisions, Sections 51100–51104; Section 51104 (h).

²¹ Department of Forestry and Fire Protection. 3 January 2002. *Timberland Site Class on Private Lands Zoned for Timber Production*. Technical working paper. Sacramento, CA. Available at: http://frap.cdf.ca.gov/publications/Timberland_Site_Class_on_Private_Lands_Zoned_for_Timber_Production.pdf

counties within the state. The County does not contain land that is designated as TPZ.^{22,23} The refined project site is not zoned for forest land, timberland, or timberland production, nor is it adjacent to land zoned as such.²⁴ Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to agricultural and forest resources in relation to a conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

(d) Result in the loss of forest land or conversion of forest land to non-forest use?

The refined project would not be expected to result in new or substantially more adverse significant impacts to agricultural and forest resources in relation to the loss of forest land or conversion of forest land to non-forest use. The refined project site is located in the City, which is an urban area. As such, the refined project would not result in the loss of forest land or conversion of forest land to non-forest use because there is no forest land on or immediately adjacent to the refined project site.²⁵ Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to agricultural and forest resources in relation to the loss of forest land or conversion of forest land to non-forest use.

(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

The refined project would not be expected to result in new or substantially more adverse significant impacts to agricultural and forest resources in relation to changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use from those disclosed in the certified EIR. The refined project would affect the same area analyzed in the certified EIR.²⁶ Based on the review of the most recent mapping undertaken by the CDC's FMMP of the County for Farmland, there is no Farmland on the refined project site.²⁷ The refined project would not be expected to enhance the suitability of any designated Farmland for development. There would be no designated Farmlands within or adjacent to the refined project site. Forest land is not located on or immediately adjacent to the proposed project site. The proposed project would not cause the conversion of forest land to non-forest use because no forest land is located in the City.

²² Department of Forestry and Fire Protection. 3 January 2002. *Timberland Site Class on Private Lands Zoned for Timber Production*. Technical working paper. Sacramento, CA. Available at: http://frap.cdf.ca.gov/publications/Timberland_Site_Class_on_Private_Lands_Zoned_for_Timber_Production.pdf

²³ County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

²⁴ County of Los Angeles Department of Regional Planning. Accessed 20 June 2011. *GIS-NET*. Available at: <http://planning.lacounty.gov/gisnet>

²⁵ California Department of Forestry and Fire Protection. Accessed 20 June 2011. Web site. Available at: <http://www.fire.ca.gov/>

²⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁷ California Department of Conservation, Division of Land Resource Protection. Farmland Mapping and Monitoring Program. 2004. *Important Farmland in California, 2002*. Sacramento, CA.

The entire refined project site is completely developed, landscaped, and built out with public institutional land uses. The surrounding areas are also developed, urban, and built out. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to agricultural and forest resources related to changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use.

3.3 AIR QUALITY

The air quality analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to air quality from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Air quality at the refined project site was evaluated with regard to the County of Los Angeles (County) General Plan,² the 2007 and Draft 2012 South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP),^{3,4} the National Ambient Air Quality Standards (NAAQS),⁵ the California Ambient Air Quality Standards (CAAQS),⁶ and the Clean Air Act (CAA).⁷

Existing air quality in the South Coast Air Basin (SCAB), in which the refined project site is located, is monitored by a network of air monitoring stations operated by the California Environmental Protection Agency (Cal/EPA), the California Air Resources Board (CARB), and the SCAQMD. The air quality assessment considers all phases of project planning, construction, and operation. The conclusions reflect guidelines established by the SCAQMD *CEQA Air Quality Handbook*.⁸

The potential for the refined project to result in new or substantially more adverse significant impacts to air quality was evaluated in relation to five questions recommended for consideration by the State California Environmental Quality Act (CEQA) Guidelines.⁹

Would the refined project:

- (a) Conflict with or obstruct implementation of the applicable air quality plan?

The refined project would not be expected to create a new or substantially more adverse significant impact to air quality related to conflicts with or obstruction of implementation of the applicable air quality plan than was previously identified in the certified EIR.¹⁰ The refined project area is located in the City of Downey (City), which is located within the SCAQMD portion of the SCAB. Ozone (O₃) is the pollutant of greatest concern throughout the SCAB. No single source accounts for most of the emissions of O₃ precursors: nitrogen oxides (NO_x), and volatile organic compounds (VOCs); many sources are spread throughout the SCAB. The County is currently designated as a federal

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

³ South Coast Air Quality Management District. June 2007. *Final 2007 Air Quality Management Plan*. Diamond Bar, CA.

⁴ South Coast Air Quality Management District. October 2012. *Draft 2012 Air Quality Management Plan*. Diamond Bar, CA.

⁵ U.S. Environmental Protection Agency. Updated and Reviewed 18 October 2011. "National Ambient Air Quality Standards (NAAQS)." *Air and Radiation*. Available at: <http://www.epa.gov/air/criteria.html>

⁶ California Air Resources Board. Reviewed 24 November 2009. *California Ambient Air Quality Standards (CAAQS)*. Available at: <http://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm>

⁷ U.S. Environmental Protection Agency. Updated 17 February 2012. "Title I - Air Pollution Prevention and Control." *Federal Clean Air Act*. Available at: <http://www.epa.gov/air/caa/>

⁸ South Coast Air Quality Management District. 1993. *CEQA Air Quality Handbook*. Diamond Bar, CA.

⁹ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

¹⁰ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

nonattainment area for fine particulate matter (PM_{2.5}), an extreme nonattainment area for ozone (O₃), and a serious nonattainment area for suspended particulate matter (PM₁₀);¹¹ however, the SCAB has achieved the federal 1-hour and 8-hour carbon monoxide (CO) air quality standards since 1990, 2002, and 2011, respectively, and the County has met the federal air quality standards for nitrogen dioxide (NO₂) since 1992.^{12,13}

The most recent update to the SCAQMD AQMP was prepared in order for air quality improvements to meet both state and federal CAA planning requirements for all areas under AQMP jurisdiction. This update was adopted by CARB for inclusion in the State Implementation Plan on September 27, 2007. An additional 2012 update is currently being prepared by the SCQAMD. The 2012 AQMP is currently in its draft stages. Both the 2007 and Draft 2012 AQMP sets forth strategies for attaining the federal PM₁₀ and PM_{2.5} air quality standards and the federal 8-hour O₃ air quality standard, as well as meeting state standards at the earliest practicable date.^{14,15} With the incorporation of new scientific data, emission inventories, ambient measurements, control strategies, and air quality modeling, the 2007 and 2012 Draft AQMP focuses on O₃ and PM_{2.5} attainments.

Existing air quality within the City vicinity is characterized by a mix of local emission sources that include stationary activities, such as space and water heating, landscape maintenance, and consumer products, as well as mobile sources. Motor vehicles are the primary source of pollutants within the refined project vicinity and have the potential to generate localized concentrations of CO, termed as CO "hotspots." Section 9.4 of the SCAQMD *CEQA Air Quality Handbook* identifies CO as a localized problem requiring additional analysis when a proposed project is likely to expose sensitive receptors to CO hotspots.¹⁶

The refined project includes demolition of additional structures that would create additional impacts related to air quality. However, as identified in the certified EIR, the refined project would comply with Air Quality Management District (AQMD) Rule 403, which would reduce impacts from the demolition of structures to below the level of significance.¹⁷ Therefore, impacts to air quality in relation to consistency with the applicable air quality plan as designated in the certified EIR would be expected to be reduced to below the level of significance with the incorporation of mitigation measures specified by SCAQMD and set forth in the certified EIR.¹⁸ The refined project would not be expected to result in new or more adverse significant impacts.

¹¹ U.S. Environmental Protection Agency. 20 July 2012. *The Green Book Nonattainment Areas for Criteria Pollutants*. Available at: <http://www.epa.gov/oar/oaqps/greenbk/>

¹² South Coast Air Quality Management District. June 2007. *Final 2007 Air Quality Management Plan*. Diamond Bar, CA.

¹³ South Coast Air Quality Management District. October 2012. *Draft 2012 Air Quality Management Plan*. Diamond Bar, CA.

¹⁴ South Coast Air Quality Management District. June 2007. *Final 2007 Air Quality Management Plan*. Diamond Bar, CA.

¹⁵ South Coast Air Quality Management District. October 2012. *Draft 2012 Air Quality Management Plan*. Diamond Bar, CA.

¹⁶ South Coast Air Quality Management District. 1993. *CEQA Air Quality Handbook*. Diamond Bar, CA.

¹⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁸ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

SCAQMD evaluates projects in terms of air pollution thresholds.¹⁹ The refined project would be considered significant if implementation of the refined project results in daily construction- or operation-related emissions that cause or exceed the SCAQMD thresholds of significance. The refined project would be expected to be consistent with both the County General Plan and the Downey Vision 2025 General Plan (Downey Vision 2025)²⁰ land use designations for the area and would not be expected to result in a change to the population growth assumptions used by SCAQMD for attainment planning. Therefore, operational impacts would be expected to be minimal. However, mitigation measures must be considered in order to reduce potential impacts to below the level of significance. Therefore, impacts to air quality in relation to consistency with the applicable air quality plan would be expected to be reduced to below the level of significance with the incorporation of mitigation measures specified in the certified EIR.²¹ Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to air quality related to conflicts with or obstruction of implementation of the applicable air quality plan.

- (b) Violate any air quality standard or contribute substantially to existing or projected air violation?

As with the approved project, the refined project would potentially result in significant, short-term air quality impacts during construction and would require consideration of the SCAQMD standard list of mitigation measures. The refined project includes additional demolition of existing structures. Emissions from the additional demolition would not cause a new air quality violation or measurably increase existing violations. There may be a temporary increase in some pollutants during construction, such as fugitive dust, but these emissions would not be sufficient to cause an exceedance of any standard and would be mitigated to the maximum extent possible through mitigation measures recommended in Chapter 11 of SCAQMD's *CEQA Air Quality Handbook*, which control construction-related emissions. Impacts to air quality standards would be expected to be reduced to below the level of significance with the incorporation of mitigation measures specified by SCAQMD and described in the certified EIR.²² Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to air quality related to a violation of any air quality standard or substantial contribution to existing or projected air violation.

- (c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

The refined project would not be expected to result in new or substantially more adverse significant impacts to air quality in relation to criteria pollutants from those disclosed in the

¹⁹ South Coast Air Quality Management District. 1993. "Developing Baseline Air Quality Information." *CEQA Air Quality Handbook*. Diamond Bar, CA.

²⁰ City of Downey Planning Division. Adopted 25 January 2005. *Downey Vision 2025 General Plan*. Downey, CA. Available at: http://www.downeyca.org/gov/cd/planning/general_plan_n_map/default.asp

²¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²² County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

certified EIR.²³ The refined project site is located within the SCAB, which is designated as a nonattainment area according to the state and federal O₃, PM₁₀, and PM_{2.5} standards. During the construction phase, primary emissions would include O₃ precursor emissions and particulate matter. O₃ precursor emissions from vehicles would be the primary source of impacts to air quality associated with operation of the refined project. Operational phase impacts are not expected from the emissions of vehicles traveling to and from the refined project site because the number of annual outpatients being served by the facility would not be expected to increase. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to air quality related to criteria pollutants.

(d) Expose sensitive receptors to substantial pollutant concentrations?

The refined project would not be expected to result in new or substantially more adverse significant impacts to air quality in relation to exposure of sensitive receptors to substantial pollutant concentrations from those disclosed in the certified EIR.²⁴ Single-family residences located approximately 70 feet from the refined project site are the nearest sensitive receptors that would potentially be affected by implementation of the refined project. Compliance with AQMD Rule 403 would be expected to reduce impacts to sensitive receptors to below the level of significance. Incorporation of mitigation measures specified by SCAQMD and described in the certified EIR would be expected to prevent any short-term significant impact to sensitive receptors.²⁵ Upon completion of the refined project, pollutant concentrations in the refined project vicinity would not be expected to change. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to air quality or sensitive receptors related to criteria pollutants.

(e) Create objectionable odors affecting a substantial number of people?

The refined project would not be expected to result in new or substantially more adverse significant impacts to air quality in relation to creating objectionable odors from those disclosed in the certified EIR.²⁶ The refined project would not include additional construction or be expected to create additional odors that were not previously analyzed in the certified EIR.²⁷ Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more significant impacts to air quality related to objectionable odors.

²³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁴ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

3.4 BIOLOGICAL RESOURCES

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to biological resources from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ As a result of the analysis undertaken in the Initial Study prepared in 1991, it was determined that the approved project would not be expected to result in significant impacts to biological resources; therefore, this environmental issue area was not carried forward for analysis in the EIR.² The Initial Study considered potential impacts to biological resources in light of the statutes and guidelines then in force. However, for purposes of internal consistency, the following analysis is organized to respond to the current State California Environmental Quality Act (CEQA) Guidelines. Biological resources at the refined project site were evaluated with regard to the County of Los Angeles General Plan;³ a query of the California Natural Diversity Database (CNDDDB)⁴ for the U.S. Geological Survey (USGS) 7.5-minute series South Gate, California, topographic quadrangle⁵ in which the refined project site is located, and all surrounding USGS 7.5-minute series topographic quadrangles (Hollywood,⁶ Los Angeles,⁷ El Monte,⁸ Whittier,⁹ Los Alamitos,¹⁰ Long Beach,¹¹ Torrance,¹² and Inglewood¹³); and a review of published and unpublished literature germane to the refined project. The potential for the refined project to result in new or substantially more adverse significant impacts to biological resources was evaluated in relation to six questions recommended for consideration by the State CEQA Guidelines:¹⁴

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² County of Los Angeles Internal Services Department. December 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report*. SCH No. 91071053, pp. A2–A16. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

³ County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

⁴ California Department of Fish and Game. Accessed August 2011. *RareFind 4: A Database Application for the Use of the California Department of Fish and Game Natural Diversity Data Base*. Sacramento, CA.

⁵ U.S. Geological Survey. [1964] Photorevised 1981. *7.5-minute Series, South Gate, California, Topographic Quadrangle*. Reston, VA.

⁶ U.S. Geological Survey. [1966] Photorevised 1981. *7.5-minute Series, Hollywood, California, Topographic Quadrangle*. Reston, VA.

⁷ U.S. Geological Survey. [1966] Photorevised 1994. *7.5-minute Series, Los Angeles, California, Topographic Quadrangle*. Reston, VA.

⁸ U.S. Geological Survey. [1966] Photorevised 1994. *7.5-minute Series, El Monte, California, Topographic Quadrangle*. Reston, VA.

⁹ U.S. Geological Survey. [1965] Photorevised 1981. *7.5-minute Series, Whittier, California, Topographic Quadrangle*. Reston, VA.

¹⁰ U.S. Geological Survey. [1964] Photorevised 1981. *7.5-minute Series, Los Alamitos, California, Topographic Quadrangle*. Reston, VA.

¹¹ U.S. Geological Survey. [1964] Photorevised 1978. *7.5-minute Series, Long Beach, California, Topographic Quadrangle*. Reston, VA.

¹² U.S. Geological Survey. [1978] Photorevised 1981. *7.5-minute Series, Torrance, California, Topographic Quadrangle*. Reston, VA.

¹³ U.S. Geological Survey. [1964] Photorevised 1981. *7.5-minute Series, Inglewood, California, Topographic Quadrangle*. Reston, VA.

¹⁴ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

Would the refined project:

- (a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

As a result of the analysis undertaken in the Initial Study for the certified EIR it was determined that the approved project would not be expected to result in significant impacts to biological resources; therefore, this environmental issue area was not carried forward for analysis in the EIR.¹⁵ The north campus is fully developed with hardscape and softscape treatments and provides no suitable habitat for special status species and is not included in any local or regional plan for the protection of such species. The refined project site is in the same location as the approved project and therefore provides habitat for the same species, none of which have been identified as candidate, sensitive, or special status. Therefore, as with the approved project, the refined project would not be expected to result in an adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) and the U.S. Fish and Wildlife Service (USFWS).

- (b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

As a result of the analysis undertaken in the Initial Study for the certified EIR, it was determined that the approved project would not be expected to result in significant impacts to biological resources; therefore, this environmental issue area was not carried forward for analysis in the EIR.¹⁶ The north campus is developed for institutional land uses; there are no riparian habitats or other sensitive natural communities present within the north campus. There are no oak or walnut trees afforded protection pursuant to the County of Los Angeles Oak Tree Ordinance. Accordingly, as with the approved project, the refined project would not be expected to result in a potential adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFG and USFWS.

- (c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

As a result of the analysis undertaken in the Initial Study for the certified EIR, it was determined that the approved project would not be expected to result in significant impacts to biological resources; therefore, this environmental issue area was not carried forward for analysis in the EIR.¹⁷ The

¹⁵ County of Los Angeles Internal Services Department. December 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report*. SCH No. 91071053, pp. A2–A16. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁶ County of Los Angeles Internal Services Department. December 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report*. SCH No. 91071053, pp. A2–A16. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁷ County of Los Angeles Internal Services Department. December 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report*. SCH No. 91071053, pp. A2–A16. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

refined project site is in the same location as the approved project, which does not contain or have the potential to affect federally protected wetlands or other “waters of the United States.” Accordingly, as with the approved project, the refined project would not be expected to result in a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

- (d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

As a result of the analysis undertaken in the Initial Study for the certified EIR, it was determined that the approved project would not be expected to result in significant impacts to biological resources; therefore, this environmental issue area was not carried forward for analysis in the EIR.¹⁸ The north campus does not support aquatic or riparian habitats; therefore, there is no potential for migratory fish to be present. The north campus is developed for institutional uses. While the developed property does provide suitable resting habitat for migratory birds or bats, it would not impede their movement. The refined project site is in the same location as the approved project, which does not interfere with wildlife corridors, species movement, or nursery sites. Therefore, as with the approved project, the refined project would not be expected to substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

- (e) Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

As a result of the analysis undertaken in the Initial Study for the certified EIR, it was determined that the approved project would not be expected to result in significant impacts to biological resources; therefore, this environmental issue area was not carried forward for analysis in the EIR.¹⁹ The refined project site is in the same location as the approved project and would be subject to the same ordinances or policies that protect biological resources. Mature oak and walnut trees are protected in the unincorporated territory of Los Angeles County and on properties owned by the County of Los Angeles, pursuant to the County of Los Angeles Oak Tree Ordinance. Plant community and mature tree mapping resulted in the determination that there are no mature oak or walnut trees afforded protection by the County's Ordinance in the refined project area. Consequently, as with the approved project, the refined project would not be expected to result in a conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

- (f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

As a result of the analysis undertaken in the Initial Study for the certified EIR, it was determined that the approved project would not be expected to result in significant impacts to biological resources;

¹⁸ County of Los Angeles Internal Services Department. December 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report*. SCH No. 91071053, pp. A2–A16. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁹ County of Los Angeles Internal Services Department. December 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report*. SCH No. 91071053, pp. A2–A16. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

therefore, this environmental issue area was not carried forward for analysis in the EIR.²⁰ The refined project would affect the same area analyzed in the certified EIR.²¹ As with the approved project, the refined project area is located in an area designated for hospital use, not in an area proposed or adopted as part of a Habitat Conservation Plan²² or a Natural Community Conservation Plan.²³ Consequently, as with the approved project, the refined project would not be expected to result in a conflict with the provisions of an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state habitat conservation plan.

²⁰ County of Los Angeles Internal Services Department. December 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report*. SCH No. 91071053, pp. A2–A16. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²² U.S. Fish and Wildlife Service. Accessed 23 June 2011. Conservation Plans and Agreements Database. Available at: http://ecos.fws.gov/conserv_plans/public.jsp

²³ California Department of Fish and Game. Accessed 8 July 2011. "Habitat Conservation Branch." Web site. Available at: <http://www.dfg.ca.gov/habcon/nccp/status/index.html>

3.5 CULTURAL RESOURCES

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to cultural resources from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ As a result of the analysis undertaken in the Initial Study prepared in 1991,² it was determined that the approved project would not be expected to result in significant impacts to cultural resources; therefore, this environmental issue area was not carried forward for analysis in the EIR.³ The Initial Study considered potential impacts to cultural resources in light of the statutes and guidelines then in force. However, for purposes of internal consistency, the following analysis is organized to respond to the current State California Environmental Quality Act (CEQA) Guidelines.⁴

The potential for the refined project to result in new or substantially more adverse significant impacts to cultural resources was evaluated in relation to four questions recommended for consideration by the State CEQA Guidelines.⁵

Would the refined project:

- (a) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

The refined project would not be expected to result in new substantially more adverse significant impacts to cultural resources related to a substantial adverse change in the significance of an archeological resource from those disclosed in the certified EIR.⁶ As noted above, potential impacts to cultural resources, including archaeological resources, were investigated in the 1991 Initial Study, which concluded that the approved project, including a net grading and construction of approximately 350,000 square feet on the 49-acre north campus, would not be expected to result in the alteration or destruction of a prehistoric or historic archaeological site.⁷ The refined project would be located within the same 49-acre parcel previously analyzed and would not involve any net increase of grading or new construction in excess of that previously approved. Therefore, there would be no expected additional impacts to cultural resources related to a substantial adverse change in the significance of an archeological resource.

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² County of Los Angeles Internal Services Department. December 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report*. SCH No. 91071053, pp. A2–A16. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁴ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

⁵ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁷ County of Los Angeles Internal Services Department. December 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report*. SCH No. 91071053, pp. A2–A16. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

A records search conducted at the South Central Coastal Information Center at the University of California, Fullerton, indicated that the refined project area has not been previously surveyed for the presence of archaeological resources. Thus, it is unknown whether the refined project site has the potential to yield archaeological resources. In addition, coordination undertaken with the Native American Heritage Commission (NAHC) determined that no Native American cultural resources have been recorded in the sacred lands file for the refined project area.⁸ The refined project includes a recommended procedure to be followed in the event of an accidental discovery of archaeological resources during construction, including stoppage of work on the site of the discovery, immediate evaluation of the find by a qualified archaeologist, and, if warranted, excavation and recovery of significant archaeological resources. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to cultural resources related to a substantial adverse change in the significance of an archeological resource.

(b) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

The refined project would not be expected to result in new or substantially more adverse significant impacts to cultural resources related to a substantial adverse change in the significance of a historical resource from that disclosed in the certified EIR.⁹ As noted above, potential impacts to cultural resources, including historical resources, were investigated in the 1991 Initial Study. The Initial Study for the certified EIR concluded that, although the Harriman Building (Building 400, LACO No. 1180), was “of interest to the community,” primary construction of the north campus occurred in the 1960s and 1970s, and none of the buildings on the refined project site was of historical significance.¹⁰ Therefore, the demolition of several buildings proposed as part of the approved project, including the Harriman Building, was not determined to be an adverse impact to historical resources. The 1992 approved project incorporated reuse of the Harriman Building facade as a symbolic gateway to the north campus.

The refined project incorporates demolition of approximately 521,000 square feet. This total does not include the Harriman Building, which would not be demolished and would instead be rehabilitated. Table 3.5-1, *1992 and Proposed Refined Project Demolition*, compares the 1992 approved project with the refined project. A north campus historical resources evaluation prepared in 2004 assessed the potential historical significance of all buildings on the north campus that were at least 40 years old at the time.¹¹ The results of that study are also presented in Table 3.5-1. Only one building, the Harriman Building, was identified as significant.

⁸ California Native American Heritage Commission, Sacramento, CA. 27 June 2011. Letter to Clarus Backes, Sapphos Environmental, Inc., Pasadena, CA.

⁹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁰ County of Los Angeles Internal Services Department. December 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report*. SCH No. 91071053, pp. A2–A16. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹¹ Kaplan Chen Kaplan Architects. September 2004. *Rancho Los Amigos National Rehabilitation Center North Campus Historic Resources Evaluation*. Santa Monica, CA.

**TABLE 3.5-1
1992 AND PROPOSED REFINED PROJECT DEMOLITION**

Building	Square Feet	1992 Demolition	Current Demolition	2004 Historic Evaluation
100s Building	123,770	Yes/123,770	Yes/123,770	Not eligible for the CRHR
400s Building / Harriman Building	75,815	Yes/75,815	No	Eligible for the CRHR & NRHP
500s Buildings	88,421	Partial/approx. 45,000	Yes/88,421	Not eligible for the CRHR
600s Buildings	46,071	Yes/46,071	Yes/46,071	Not eligible for the CRHR
700s Buildings	61,770	Partial/approx. 35,000	Yes/61,770	Not eligible for the CRHR
800s Buildings	61,770	Partial/approx. 13,000	Yes/61,770	Not eligible for the CRHR
800A West Building	5,760	No	Yes/5,760	Not eligible for the CRHR
800B East Building	5,760	Yes/5,760	Yes/5,760	Not eligible for the CRHR
900s Buildings	81,260	Partial/approx. 12,000	Yes/81,260	Not eligible for the CRHR
900 A Building	5,760	No	Yes/5,760	Not eligible for the CRHR
900 B Building	5,760	N/A	Yes/5,760	Not eligible for the CRHR
Miscellaneous outbuildings	Approx 35,140	N/A	Yes/35,140	Not eligible for the CRHR
Total		Approx. 356,000	Approx. 521,000	

KEY:

CRHR = California Register of Historical Resources

NRHP = National Register of Historic Places

N/A = not applicable

NOTE:

Square footages were accurate as of 2008 and may not be consistent with square footage data presented in the certified EIR due to building or planning alterations that may have occurred since 1992.

The refined project states that the Harriman Building would be rehabilitated consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.¹² In addition, none of the buildings currently proposed for demolition is considered to be a historic resource as defined by CEQA. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to cultural resources related to a substantial adverse change in the significance of a historical resource.

¹² Weeks, Kay D., and Anne E. Grimmer. 1995. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstruction Historic Buildings*. Washington, DC: U.S. Department of the Interior, National Park Service.

- (c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The refined project would not be expected to result in new or substantially more adverse significant impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource, site, or geologic feature from those disclosed in the certified EIR.¹³ Impacts to paleontological resources normally occur when a project involves excavation or demolition of buildings requiring disturbance of native soils. Disturbance of native soils that have a moderate to high potential to contain unique paleontological resources has the potential to result in the loss of scientific information. As analyzed in the certified EIR, the approved project included an increase of 350,183 square feet of hospital space.¹⁴ The approved project also included demolition of many buildings on the north campus:

- Harriman Building (except building facade)
- 100s Building
- Partial 500s Buildings
- 600s Buildings
- 701, 702, and 703 Buildings
- Partial 800s Buildings
- Partial 900s Buildings

The approved construction and demolition activities had the potential to affect native soils on approximately 75 percent of the 49 acres that compose the north campus.

Two elements of the refined project, a 56,000-square-foot expansion of the existing Jacquelin Perry Institute (JPI) Building and construction of approximately 122,000 square feet of the new Outpatient Facilities, would involve subsurface excavations within the area evaluated in the certified EIR.¹⁵ A paleontological record search was conducted for the refined project area at the Natural History Museum of Los Angeles County to assess the relative level of sensitivity for the refined project area to contain unique paleontological resources.¹⁶ The refined project area is underlain by surficial deposits of younger Quaternary alluvium (Pleistocene and Holocene) as a result of deposition from the Los Angeles River, which currently flows through a concrete channel just west of the refined project area. These younger Quaternary deposits do not usually contain significant fossil vertebrates in the uppermost layers. The closest known fossil locality, identified as LACM 3382, is situated southwest of the refined project area, west of Interstate 710 (Long Beach Freeway), east of Wilmington Avenue, and north of Artesia Boulevard. This locality produced a specimen of fossil mammoth, *Mammuthus*, at a depth of 5 feet below the surface.

Surface grading or very shallow excavations within the refined project site are unlikely to uncover significant fossil vertebrates. However, based on the fossil findings previously mentioned, it is likely that deeper excavations extending down into older Quaternary alluvium may encounter

¹³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁴ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁶ McLeod, Samuel A., Natural History Museum of Los Angeles County. 13 August 2004. Letter to Laurie A. Solis, Sapphos Environmental, Inc., Pasadena, CA.

significant fossil vertebrate remains. The refined project requires paleontological construction monitoring and recovery of paleontological resources from the grading sites in accordance with standards for such recovery established by the Society of Vertebrate Paleontology such that potential for significant impacts to paleontological resources through the inadvertent loss of important scientific information would be avoided. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource, site, or geologic feature.

(d) Disturb any human remains, including those interred outside of formal cemeteries?

The refined project would not be expected to result in new or substantially more adverse significant impacts to human remains, including those interred outside of formal cemeteries, from those disclosed in the certified EIR.¹⁷

The Initial Study and EIR did not identify the presence of human remains within the 49-acre north campus.¹⁸ The refined project would affect the same area analyzed in the certified EIR.¹⁹ As specified in the refined project, in accordance with California Health and Safety Code Sections 7050 and 7052, in the event of the discovery of human remains outside of a dedicated cemetery, all ground disturbance would cease and the County of Los Angeles Coroner would be notified. Furthermore, in accordance with Public Resources Code Section 5097.98, the NAHC would be notified in the event that the County Coroner determines that the remains are Native American. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to human remains.

¹⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁸ County of Los Angeles Internal Services Department. December 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report*. SCH No. 91071053, pp. A2–A16. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

3.6 GEOLOGY AND SOILS

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to geology and soils from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Impacts related to geology and soils at the refined project site were evaluated with regard to the County of Los Angeles General Plan Safety Element;² the U.S. Geological Survey (USGS) 7.5-minute series, South Gate, California, topographic quadrangle,³ in which the refined project site is located, and the adjacent Whittier, California, topographic quadrangle;⁴ California Division of Mines and Geology (CDMG) publications;⁵ the most recent Alquist-Priolo Earthquake Fault Zoning Maps; published maps;^{6,7,8} and technical studies.

The potential for the refined project to result in new or substantially more adverse significant impacts to geology and soils was evaluated in relation to eight questions recommended for consideration by the State California Environmental Quality Act Guidelines:⁹

Would the refined project:

- (a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

The refined project would not be expected to create new or substantially more adverse significant impacts related to the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault from those disclosed in the certified EIR. The refined project would affect the same area analyzed in the

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² County of Los Angeles Department of Regional Planning. 1990. *County of Los Angeles General Plan, Safety Element*. Los Angeles, CA.

³ U.S. Geological Survey. [1964] Photorevised 1981. *7.5-minute Series, South Gate, California, Topographic Quadrangle*. Reston, VA.

⁴ U.S. Geological Survey. [1965] Photorevised 1981. *7.5-minute Series, Whittier, California, Topographic Quadrangle*. Reston, VA.

⁵ California Geological Survey. 1962. *Mines and Mineral Resources of Los Angeles County California*. Los Angeles, CA.

⁶ California Geological Survey. Revised 2007. *Fault-Rupture Hazard Zones in California*. Special Publication 42. Sacramento, CA. Available at: <ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf>

⁷ California Geological Survey. Revised 2008. *Seismic Shaking Hazard Maps of California, Map Sheet 48*. Sacramento, CA: Office of the State Geologist. Available at: http://www.consrv.ca.gov/cgs/information/publications/ms/Documents/MS48_revised.pdf

⁸ U.S. Geological Survey. 1989. *Map Showing Late Quaternary Faults and 1978–84 Seismicity of the Los Angeles Region, California*. Reston, VA.

⁹ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

certified EIR.¹⁰ The refined project area is not located within an Alquist-Priolo Earthquake Fault Zone, and no known active faults are known to exist on the refined project site.¹¹ The refined project site is located 6.7 miles northeast of the Newport-Inglewood fault. The Avalon-Compton fault lies within the central portion of the Newport-Inglewood fault zone, approximately 2.5 miles from the refined project site.¹² Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to exposing people or structures to potential substantial adverse effects involving the rupture of a known earthquake fault than those disclosed in the certified EIR.¹³

ii) Strong seismic ground shaking?

The refined project would not be expected to create new or substantially more adverse significant impacts related to the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking from those disclosed in the certified EIR. The refined project would affect the same area analyzed in the certified EIR.¹⁴ The refined project site would be subject to strong ground shaking in the event of a major regional earthquake. However, the refined project would be constructed in accordance with applicable state requirements, including the Uniform Building Code seismic safety requirements. Compliance with existing standards and requirements would ensure an adequate level of protection from seismic hazards. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to exposing people or structures to potential substantial adverse effects involving strong seismic ground shaking.

iii) Seismic-related ground failure, including liquefaction?

The refined project would not be expected to create new or substantially more adverse significant impacts related to the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction, from those disclosed in the certified EIR. The refined project would affect the same area analyzed in the certified EIR.¹⁵ The primary factors influencing liquefaction potential include groundwater, soil type, and intensity of ground shaking. Liquefaction potential is greatest in saturated, loose, and poorly graded sand. Based on previous investigations, the subsurface material is classified as bedrock.¹⁶ As indicated in the certified EIR, the potential for soil liquefaction and

¹⁰ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹¹ California Geological Survey. Revised 2007. *Fault-Rupture Hazard Zones in California*. Special Publication 42. Sacramento, CA. Available at: <ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf>

¹² BBL Environmental Information. 11 January 2007. *Radius Map Report, 7601 E. Imperial Highway, Downey*. Inquiry No. SAPP3413. Solana Beach, CA.

¹³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA, p. 121.

¹⁴ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁶ County of Los Angeles Internal Services Department. January 1991. *Geologic Seismic Study for Rancho Los Amigos Medical Center*. Prepared by: LeRoy Crandall and Associates, Los Angeles, CA. Los Angeles, CA.

other secondary seismic hazards, such as lurch cracks and seismically induced settlement, are considered to be less than significant.¹⁷

Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to exposing people or structures to potential substantial adverse effects involving seismic-related ground failure, including liquefaction.

iv) Landslides?

The refined project would not be expected to create new or substantially more adverse significant impacts related to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, from those disclosed in the certified EIR. The refined project would affect the same area analyzed in the certified EIR.¹⁸ The County General Plan Landslide Inventory Map does not identify the refined project area as being located in a landslide area.¹⁹ The topography of the refined project site has relatively flat terrain, with shallow downward slopes in a westerly direction. Based on a review of the USGS 7.5-minute series, South Gate, California, topographic quadrangle map, in which the refined project site is located, and the Whittier, California, topographic quadrangle, which is adjacent to the refined project site, no areas susceptible to seismic-induced landslides are shown in the refined project vicinity.^{20,21} Landslides are not considered to be a potential hazard at the refined project site and, therefore, would not affect any of the refined project's modified components. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to exposing people or structures to potential substantial adverse effects involving landslides.

(b) Result in substantial soil erosion or the loss of topsoil?

The refined project would not be expected to create new or substantially more adverse significant impacts related to substantial soil erosion or the loss of topsoil from those disclosed in the certified EIR. The refined project would affect the same area analyzed in the certified EIR.²² The materials most susceptible to erosion are natural soil and younger alluvium, which exist at the surface of the refined project site. Areas susceptible to erosion typically include steeper slopes and are located along drainage courses. Due to the relatively flat terrain of the refined project site, significant site erosion would not be anticipated. The largest threat of erosion is from uncontrolled drainage, especially during construction. As indicated in the certified EIR, project components could be

¹⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA, page 126.

¹⁸ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁹ County of Los Angeles Internal Services Department. January 1991. *Geologic Seismic Study for Rancho Los Amigos Medical Center*. Prepared by: LeRoy Crandall and Associates, Los Angeles, CA. Los Angeles, CA.

²⁰ U.S. Geological Survey. [1964] Photorevised 1981. *7.5-minute Series, South Gate, California, Topographic Quadrangle*. Reston, VA.

²¹ U.S. Geological Survey. [1965] Photorevised 1981. *7.5-minute Series, Whittier, California, Topographic Quadrangle*. Reston, VA.

²² County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

susceptible to promoting erosion during site grading, earthmoving, and construction activities.²³ As with the approved project, the refined project components and the overall site would be addressed for drainage and erosion in accordance with building code requirements and storm water best management practices relative to potential on- and off-site effects. These impacts should be less than significant provided that the codes and storm water practices are incorporated into the refined project's design and construction. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to substantial soil erosion or the loss of topsoil.

- (c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

The refined project would not be expected to create new or substantially more adverse significant impacts related to location on a geologic unit or soil that is unstable or that would become unstable as a result of the refined project, potentially resulting in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse, from those disclosed in the certified EIR. The refined project would affect the same area analyzed in the certified EIR.²⁴ The California Geological Survey Seismic Hazard Map does not identify the location of the proposed buildings as being located in a landslide area but does identify the project site to be located in an area susceptible to liquefaction.²⁵ In accordance with building code requirements, geotechnical studies would be conducted for each structural modification to the refined project components to evaluate potentially unstable soils relative to on- and off-site effects and specify measures to remediate any such conditions consistent with the requirements of the certified EIR.²⁶ Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to location on a geologic unit or soil that is unstable or would become unstable as a result of the refined project, potentially resulting in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse.

- (d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

The refined project would not be expected to create new or substantially more adverse significant impacts related to location of proposed structures on expansive soil, creating substantial risks to life or property, from those disclosed in the certified EIR. The refined project would affect the same area analyzed in the certified EIR.²⁷ The potential for expansion of the near-surface soils is low.²⁸ Construction in accordance with California Building Codes would result in a less than significant

²³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA, page 126.

²⁴ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁵ California Geological Survey, Division of Mines and Geology. Released 25 March 1999. *Seismic Hazard Zones Map, South Gate Quadrangle*. Available at: http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_sgate.pdf

²⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁸ County of Los Angeles Internal Services Department. April 1991. *Report of Foundation Investigation*. Prepared by: LeRoy Crandall and Associates, Los Angeles, CA. Los Angeles, CA.

impact. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to location on expansive soil.

- (e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

The refined project would not be expected to create new or substantially more adverse significant impacts related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater from those disclosed in the certified EIR.²⁹ As with the approved project, the refined project site would be connected to the municipal sewer system. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

²⁹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

3.7 GREENHOUSE GAS EMISSIONS

The analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to greenhouse gas (GHG) emissions from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ GHG emissions at the refined project site were evaluated with regard to Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines.²

3.7.1 Background Information

This section provides an introduction to the characteristics of the six principal greenhouse gases (GHGs), the greenhouse effect, potential contributing factors to global climate change, and the statewide 1990 and 2004 GHG emission profile.

Characteristics of Six Principal Greenhouse Gases

According to the California Global Warming Solutions Act of 2006 (Assembly Bill 32), GHG emissions are defined as emissions of the following gases: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. The U.S. Environmental Protection Agency (EPA) has reported that the majority of GHG emissions in the United States can be attributed to the energy sector, which accounted for 86.7 percent of total U.S. GHG emissions in 2009 due to stationary and mobile fuel combustion.³ The industrial sector accounted for 4.3 percent of U.S. GHG emissions in 2009.⁴ A detailed description of the characteristics and effects of the other six principal GHGs is provided below.

Carbon Dioxide

CO₂ is a colorless, odorless, and nonflammable gas that is the most abundant GHG in the Earth's atmosphere after water vapor. CO₂ enters the atmosphere through natural processes, such as respiration and forest fires; and through human activities such as the burning of fossil fuels (oils, natural gas, and coal) and solid waste, deforestation, and industrial processes. CO₂ absorbs terrestrial infrared radiation that would otherwise escape to space and, therefore, plays an important role in atmospheric warming. CO₂ has an atmospheric lifetime of up to 200 years and, therefore, is a more important GHG than water vapor, which has an atmospheric residence time of only a few days. CO₂ provides the reference point for the global warming potential (GWP) of other gases; thus, the GWP of CO₂ is equal to 1.

Methane

CH₄ is a principal component of natural gas and consists of a single carbon atom bonded to four hydrogen atoms. It is formed and released to the atmosphere by biological processes from livestock

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

³ U.S. Environmental Protection Agency. Re-released April 15, 2012. *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2009*. Washington, DC.

⁴ U.S. Environmental Protection Agency. Re-released April 15, 2012. *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2009*. Washington, DC.

and other agricultural practices and by the decay of organic waste in anaerobic environments such as municipal solid waste landfills. CH₄ is also emitted during the production and transport of coal, natural gas, and oil. CH₄ is about 21 times more powerful at warming the atmosphere than CO₂ (a GWP of 21).

The chemical lifetime of CH₄ in the atmosphere is approximately 12 years. The relatively short atmospheric lifetime of CH₄, coupled with its potency as a GHG, makes it a candidate for mitigating global warming over the short term. CH₄ can be removed from the atmosphere by a variety of processes, such as the oxidation reaction with hydroxyl radicals (OH), microbial uptake in soils, and reaction with chlorine (Cl) atoms in the marine boundary layer.

Nitrous Oxide

N₂O is a clear, colorless gas with a slightly sweet odor. N₂O has a long atmospheric lifetime (approximately 120 years) and heat-trapping effects about 310 times more powerful than CO₂ on a per molecule basis (a GWP of 310). N₂O is produced by both natural and human-related sources. The primary anthropogenic sources of N₂O are agricultural soil management like soil cultivation practices, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, and production of adipic and nitric acids. The natural process of producing N₂O ranges from a wide variety of biological sources in soil and water, particularly microbial action in wet tropical forests.

Fluorinated Gases

Hydrofluorocarbons (HFCs), perfluorocarbons, and sulfur hexafluoride are synthetic, powerful GHGs that are emitted from a variety of industrial processes, including aluminum production, semiconductor manufacturing, electric power transmission, magnesium production and processing, and the production of HCFC-22. Fluorinated gases are being used as substitutes for ozone-depleting chlorofluorocarbons (CFCs). Fluorinated gases are typically emitted in small quantities; however, they have high GWPs of between 140 and 23,900.⁵

Greenhouse Effect

GHGs trap energy from the sun and help maintain the temperature of the Earth's surface, creating a process known as the greenhouse effect. The sun emits solar radiation and provides energy to Earth. Six percent of the solar radiation emitted by the sun is reflected back by the atmosphere surrounding the Earth, 20 percent of the solar radiation is scattered and reflected by clouds, 19 percent of the solar radiation is absorbed by the atmosphere and clouds, 4 percent of the solar radiation is reflected back to the atmosphere by the Earth's surface, and 51 percent of the solar energy is absorbed by the Earth. GHGs such as CO₂ and CH₄ are naturally present in the atmosphere. The presence of these gases prevents outgoing infrared radiation from escaping the Earth's surface and lower atmosphere, allowing incoming solar radiation to be absorbed by living organisms on Earth. Without these GHGs, the earth would be too cold to be habitable; however, an excess of GHGs in the atmosphere can cause global climate change by raising the Earth's temperature, resulting in environmental consequences related to snowpack losses, flood hazards, sea-level rises, and fire hazards.

⁵ California Climate Action Registry. January 2009. *California Climate Action Registry General Reporting Protocol, Version 3.1*. Los Angeles, CA.

Contributing Factors to Global Climate Change

Global climate change results from a combination of three factors: (1) natural factors such as changes in the sun's intensity or slow changes in the Earth's orbit around the sun; (2) natural processes within the Earth's climate system, such as changes in ocean circulation; and (3) anthropogenic activities, such as fossil fuel combustion, deforestation, reforestation, urbanization, and desertification, that change the composition of atmospheric gases. In its 2007 climate change synthesis report to policy makers, the Intergovernmental Panel on Climate Change (IPCC) concluded, "Global GHG emissions due to human activities have grown since pre-industrial times, with an increase of 70 percent between 1970 and 2004."⁶ Therefore, significant attention is being given to the anthropogenic causes of the increased GHG emissions level. In the review of publications from California Air Pollution Control Officers Association (CAPCOA),⁷ California Air Resources Board (CARB),⁸ the California Attorney General,⁹ and the Governor's Office of Planning and Research (OPR),¹⁰ there is a consensus on the close association between fossil fuel combustion, in conjunction with other human activities, and GHG emissions.

Greenhouse Gas Emission Profile of California

In California, GHG emissions are largely contributed by the transportation sector, which was responsible for 35 and 38 percent of 1990 and 2004 GHG emissions statewide, respectively. After transportation followed the electricity generation sector, which was responsible for 25 percent of statewide emissions in both 1990 and 2004; the industrial sector, which was responsible for 24 percent and 20 percent of statewide 1990 and 2004 GHG emissions; and the commercial sector, which was responsible for 3 percent of statewide emissions in both 1990 and 2004.¹¹

Provision of critical health care services through implementation of the refined project would be categorized as being in the commercial sector. GHG emissions contributed by construction and operation of the refined project would have the potential to contribute to statewide GHG emissions.

⁶ Intergovernmental Panel on Climate Change. Approved 12–17 November 2007. *Climate Change 2007: Synthesis Report, Summary for Policymakers*, p. 5. Valencia, Spain. Available at: http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4_syr_spm.pdf

⁷ California Air Pollution Control Officers Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. Sacramento, CA.

⁸ California Air Resources Board. 24 October 2008. *Preliminary Draft Staff Proposal: Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act*. Available at: http://www.opr.ca.gov/ceqa/pdfs/Prelim_Draft_Staff_Proposal_10-24-08.pdf

⁹ California Department of Justice, Office of the Attorney General. Updated 9 December 2008. *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level*. Sacramento, CA.

¹⁰ California Governor's Office of Planning and Research. 19 June 2008. *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*. Technical Advisory. Sacramento, CA.

¹¹ California Air Resources Board. 12 April 2012. *California 1990 Greenhouse Gas Emissions Level and 2020 Limit*. Sacramento, CA.

3.7.2 Regulatory Framework

State

This regulatory framework identifies the state laws that govern the regulation of GHG emissions and must be considered by the County regarding decisions on projects that involve construction, operation, or maintenance activities that would result in GHG emissions. In October 2007, the CARB published a list of 44 early-action measures to reduce GHG emissions in California.¹² This regulatory framework identifies state guidance on early GHG emissions reduction measures that must be considered by the County.

California Clean Air Act

The California Clean Air Act (CAA) of 1988 requires all air pollution control districts in the state to endeavor to achieve and maintain state ambient air quality standards for ozone (O₃), carbon monoxide (CO), and nitrogen dioxide (NO₂) by the earliest practicable date and to develop plans and regulations specifying how they will meet this goal. There are no planning requirements for the state particulate matter with a diameter of 10 microns or less (PM₁₀) standard. CARB, which became part of Cal/EPA in 1991, is responsible for meeting state requirements of the federal CAA, administering the California CAA, and establishing the California Ambient Air Quality Standards (CAAQS). The California CAA, amended in 1992, requires all air districts in the state to endeavor to achieve and maintain the CAAQS. The CAAQS are generally stricter than national standards for the same pollutants, but there is no penalty for nonattainment. California has also established state standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles, for which there are no national standards. On April 2, 2007, the Supreme Court in *Massachusetts, et al. v. Environmental Protection Agency, et al.* (549 U.S. 1438; 127 S. Ct. 1438) ruled that the Clean Air Act gives the EPA the authority to regulate emissions of GHGs, including CO₂; CH₄; N₂O; and fluorinated gases, such as hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride,¹³ thereby legitimizing GHGs as air pollutants under the Clean Air Act.

Executive Order S-3-05

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05. Recognizing that California is particularly vulnerable to the impacts of climate change, Executive Order S-3-05 establishes statewide climate change emission reduction targets to reduce CO_{2e} to the 2000 level (473 million metric tons) by 2010, to the 1990 level (427 million metric tons of CO_{2e}) by 2020, and to 80 percent below the 1990 level (85 million metric tons of CO_{2e}) by 2050 (Table 3.7.2-1, *California Greenhouse Gas Business-as-Usual Emissions and Targets*).^{14,15}

¹² California Air Resources Board. October 2007. *Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration*. Available at: http://www.arb.ca.gov/cc/ccea/meetings/ea_final_report.pdf

¹³ U.S. Supreme Court. 2 April 2007. *Massachusetts, et al. v. Environmental Protection Agency, et al.* 549 U.S. 1438; 127 S. Ct. 1438. Washington, DC.

¹⁴ California Governor. 1 June 2005. Executive Order S-3-05. Sacramento, CA.

¹⁵ California Climate Action Team. April 3 2006. *Climate Action Team Report to Governor Schwarzenegger and the California Legislature*. Sacramento, CA.

**TABLE 3.7.2-1
CALIFORNIA GREENHOUSE GAS BUSINESS-AS-USUAL EMISSIONS AND TARGETS**

California Greenhouse Gas Emissions (Million Metric Tons of CO ₂ Equivalent)					
Year	1990	2000	2010	2020	2050
Business-as-usual emissions	427	473	532	596	762*
Target emissions	—	—	473	427	85

NOTE: * CARB has not yet projected 2050 emissions under a business-as-usual scenario; therefore, 2050 business-as-usual emissions were calculated assuming a linear increase of emissions from 1990 to 2050.

The executive order directs the Cal/EPA secretary to coordinate and oversee efforts from multiple agencies (i.e., secretary of the Business Portal, Transportation and Housing Agency; secretary of the Department of Food and Agriculture; secretary of the Resources Agency; chairperson of CARB; chairperson of the Energy Commission; and president of the California Public Utilities Commission) to reduce GHG emissions to achieve the target levels. In addition, the Cal/EPA secretary is responsible for submitting biannual reports to the governor and state legislature that outline: (1) progress made toward reaching the emission targets, (2) impacts of global warming on California’s resources, and (3) measures and adaptation plans to mitigate these impacts. To further ensure the accomplishment of the targets, the secretary of Cal/EPA created a Climate Action Team made up of representatives from agencies listed above to implement global warming emission reduction programs and report on the progress made toward meeting the statewide GHG targets established in this executive order. In 2006, the first report was released and identified that “the climate change emission reduction targets [could] be met without adversely affecting the California economy,” and “when all [the] strategies are implemented, those underway and those needed to meet the Governor’s targets, the economy will benefit.”¹⁶

Assembly Bill 32: Global Warming Solutions Act of 2006

Signed by Governor Arnold Schwarzenegger in September 2006, Assembly Bill 32 (AB 32), the Global Warming Solutions Act, requires a statewide commitment and effort to reduce GHG emissions to 1990 levels by 2020 (25 percent below business as usual).¹⁷ This intended reduction in GHG emissions will be accomplished with an enforceable statewide cap on GHG emissions, which will be phased in, in 2012. To effectively implement the cap, AB 32 requires the CARB to develop appropriate regulations and establish a mandatory reporting system to track and monitor global warming emissions levels from stationary sources. This bill is the first statewide policy in the United States to mitigate GHG emissions and include penalties for noncompliance. Consistent with goals and targets set by other actions taking place at the regional and international levels, AB 32 sets precedence in inventorying and reducing GHG emissions.

Executive Order S-20-06

On October 17, 2006, Governor Arnold Schwarzenegger signed Executive Order S-20-06, which calls for continued efforts and coordination among state agencies on the implementation of GHG

¹⁶ California Climate Action Team. January 12 2006. Final Draft of Chapter 8 on Economic Assessment of the Draft *Climate Action Team Report to the Governor and Legislature*. Sacramento, CA.

¹⁷ California Assembly. 2002. Assembly Bill 32: California Climate Solutions Act of 2006. Sacramento, CA. Available at: <http://www.arb.ca.gov/cc/docs/ab32text.pdf>

emission reduction policies and AB 32 and Health and Safety Code (Division 25.5) through the design and development of a market-based compliance program.¹⁸ In addition, Executive Order S-20-06 requires the development of GHG emissions reporting and reduction protocols and a multistate registry through joint efforts among CARB, Cal/EPA, and the California Climate Action Registry (CCAR). Economic analysis, including a cost-effectiveness analysis, shall be used to develop a plan, by June 1, 2008, that will create incentives for market-based mechanisms that have the potential of reducing GHG emissions.¹⁹

California Senate Bill 97

Approved by Governor Arnold Schwarzenegger on August 24, 2007, SB 97 is designed to work in conjunction with the State California Environmental Quality Act (CEQA) Guidelines and AB 32. Pursuant to the State CEQA Guidelines, OPR is required to prepare and develop guidelines for implementation of CEQA by public agencies. AB 32 requires the CARB to monitor and regulate GHG emission sources to reduce these emissions. In addition, "SB 97 requires OPR, by July 1, 2009, to prepare, develop, and transmit to the [CARB] guidelines for the feasible mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions, as required by CEQA, including, but not limited to, effects associated with transportation or energy consumption."²⁰ On April 13, 2009, OPR submitted proposed amendments to the State CEQA Guidelines to the Secretary for Natural Resources.²¹ The Natural Resources Agency conducted a formal rulemaking in 2009, before certification and adoption of the amendments; the amendments became effective on March 18, 2010. In addition, OPR and CARB are required to periodically update the guidelines with new information or criteria established by CARB pursuant to AB 32. SB 97 exempts transportation projects funded under the Highway Safety, Traffic Reduction, Air Quality and Port Security Bond Act of 2006, and projects funded under the Disaster Preparedness and Flood Prevention Bond Act of 200, but it would apply to any environmental documents, including an Environmental Impact Report, Negative Declaration, Mitigated Negative Declaration, or other documents required by CEQA that have not been certified or adopted by the CEQA lead agency by the date of the adoption of the regulations.

Revisions to Appendix G of the CEQA Guidelines (part of the amendments that became effective on March 18, 2010) recommend that projects be evaluated for the following impacts:

- Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Individual projects incrementally contribute to the potential for global climate change on a cumulative basis in concert with all other past, present, and probable future projects. While individual projects are unlikely to measurably affect global climate change, each of these projects

¹⁸ California Governor. 2006. Executive Order S-20-06. Sacramento, CA.

¹⁹ California Governor. 2006. Executive Order S-20-06. Sacramento, CA.

²⁰ California Governor's Office of Planning and Research. 24 August 2007. Senate Bill No. 97, Chapter 185. Available at: http://www.opr.ca.gov/ceqa/pdfs/SB_97_bill_20070824_chaptered.pdf

²¹ California Governor's Office of Planning and Research. April 2009. *CEQA Guidelines Sections Proposed to be Added or Amended*. Available at: http://www.opr.ca.gov/ceqa/pdfs/PA_CEQA_Guidelines.pdf

incrementally contributes to the potential for global climate change on a cumulative basis, in concert with all other past, present, and probable future projects.

California Department of Justice, Office of the Attorney General, Guidance Letter on California Environmental Quality Act, Addressing Global Warming Impacts at the Local Agency Level

On March 11 and May 21, 2008, the California Department of Justice, Office of the Attorney General, provided guidance to public agencies on how to address global warming impacts in CEQA documents. In the publication entitled *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level*, the Office of the Attorney General directs public agencies to take a leadership role in integrating sustainability into public projects by providing 52 project-level mitigation measures for consideration in the development of projects.²² In addition, the Office of the Attorney General has negotiated four settlement agreements under CEQA, all of which require the project proponents to consider sustainable design for projects and feasible mitigation measures and alternatives to substantially lessen global warming-related effects.

Assembly Bill 1493

On July 22, 2002, Governor Gray Davis signed Assembly Bill (AB) 1493, also known as the Pavley Regulations or the Clean Car Standards. AB 1493 required the state to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of GHG emissions emitted by passenger vehicles and light-duty trucks. Subsequent regulations were adopted by CARB in September 2004.

The regulations were threatened by automaker lawsuits and were stalled by the EPA's initial denial to allow California to implement GHG standards for passenger vehicles. The EPA later granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles on June 30, 2009. On September 24, 2009, the CARB adopted amendments to the Pavley regulations that reduce GHG emissions in new passenger vehicles from 2009 through 2016.

California Climate Action Registry

Established in 2001, the CCAR is a private nonprofit organization originally formed by the State of California. The CCAR serves as a voluntary GHG registry and has taken a leadership role on climate change by developing credible, accurate, and consistent GHG reporting standards and tools for businesses, government agencies, and nonprofit organizations to measure, monitor, and reduce GHG emissions. For instance, the CCAR General Reporting Protocol, Version 3.1, dated January 2009, provides the principles, approach, methodology, and procedures required for voluntary GHG emissions reporting by businesses, government agencies, and nonprofit organizations.²³ In 2007, the County became a member of the CCAR and has committed its efforts to monitor, report, and reduce GHG emissions pursuant to their participation in the CCAR.

²² California Department of Justice, Office of the Attorney General. 21 May 2008 (Updated 26 September 2008). *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level*. Sacramento, CA.

²³ California Climate Action Registry. January 2009. *California Climate Action Registry General Reporting Protocol: Reporting Entity-Wide Greenhouse Gas Emissions*. Version 3.1. Los Angeles, CA. Available at: http://www.climateregistry.org/resources/docs/protocols/grp/GRP_V3_April2008_FINAL.pdf

Regional

South Coast Air Quality Management District Climate Change Policy

On September 5, 2008, the South Coast Air Quality Management District (SCAQMD) Governing Board approved the SCAQMD Climate Change Policy, which directs SCAQMD to assist the state, cities, local governments, businesses, and residents in areas related to reducing emissions that contribute to global warming.²⁴ Pursuant to the policy, the SCAQMD will

- a. Establish Climate Change Programs;
- b. Implement SCAQMD Command-and-Control and Market-Based Rules;
- c. Review and comment on future legislation related to climate change and GHGs;
- d. Prioritize projects that reduce both criteria and toxic pollutants and GHG emissions;
- e. Provide guidance on analyzing GHG emissions and identify mitigation measures to CEQA projects;
- f. Provide revisions to SCAQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*,²⁵ which is consistent with the state guidance, to include information on GHG strategies as a resource for local governments;
- g. Update the SCAQMD's GHG inventory in conjunction with each Air Quality Management Plan and assist local governments in developing GHG inventories;
- h. Reduce SCAQMD climate change impacts; and
- i. Inform the public on various aspects of climate change, including understanding impacts, technology advancement, public education, and other emerging aspects of climate change science. Therefore, the goals of the SCAQMD Climate Change Policy are to decrease SCAQMD's carbon footprint, assist businesses and local governments with implementation of climate change measures, and provide information regarding climate change to the public.

Local

County of Los Angeles Energy and Environmental Policy

The County Board of Supervisors adopted a County-wide energy and environmental policy (Policy No. 3.045), which became effective on December 19, 2006.²⁶ The goal of this policy is to provide

²⁴ South Coast Air Quality Management District. 5 September 2008. *SCAQMD Climate Change Policy*. Available at: <http://www.aqmd.gov/hb/2008/September/080940a.htm>

²⁵ South Coast Air Quality Management District. 6 May 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Diamond Bar, CA.

²⁶ County of Los Angeles Board of Supervisors. 19 December 2006. "Policy No. 3.045, Energy and Environmental Policy." *Los Angeles County Board of Supervisors Policy Manual*. Available at: <http://countypolicy.co.la.ca.us/>

guidelines for development, implementation, and enhancement of energy conservation and environmental programs within the County. The policy established an Energy and Environmental Team to coordinate the efforts of various County departments, established a program to integrate sustainable technologies into its Capital Project Program, established an energy consumption reduction goal of 20 percent by the year 2015 in County facilities, and became a member of the CCAR in 2007 to assist the County in establishing goals for reducing GHGs. In addition, the policy included four program areas to implement green design and sustainable operation of County facilities and reduce the County's environmental footprint. Goals and initiatives for each program area are included as follows:

Energy and Water Efficiency

- Implementing and monitoring energy and water conservation practices
- Implementing energy and water efficiency projects
- Enhancing employee energy and water conservation awareness through education and promotion

Environmental Stewardship

- Investigating requirements and preferences for environmentally friendly packaging, greater emphasis on recycled products, and minimum energy efficiency standards for appliances
- Placing an emphasis on recycling and landfill volume reduction within County buildings
- Investigating the use of environmentally friendly products
- Supporting environmental initiatives through the investigation of existing resource utilization

Public Outreach and Education

- Implementing a program that provides County residents with energy-related information, including energy and water conservation practices, utility rates and rate changes, rotating power outage information, emergency power outage information, and energy efficiency incentives
- Seeking collaboration with local governments, public agencies, and County affiliates to strengthen regional, centralized energy, and environmental management resources; and identify and develop opportunities for information and cost sharing in energy management and environmental activities

Sustainable Design

- Enhancing building sustainability through the integration of green, sustainable principles into the planning, design, and construction of County capital projects, which complement the functional objectives of the project, extend the life cycle / useful life of buildings and sites, optimize energy and water use efficiency, improve indoor environmental quality and provide healthy work environments, reduce ongoing building maintenance requirements, and encourage use and reuse of environmentally friendly materials and resources
- Establishing a management approach that instills and reinforces the integration of sustainable design principles into the core competency skill set of the County's planner, architects, engineers, and project managers
- Establishing practical performance measures to determine the level of sustainability achieved relative to the objectives targeted for the individual project and overall capital program

3.7.3 Existing Conditions

Under a business-as-usual development scenario, the CARB has recommended that 427 million metric tons be used as the total GHG emissions in CO_{2e} for California in 1990 and that 596 million metric tons of CO_{2e} emissions be used as the projected level for 2020, presenting a linear upward trend.²⁷ To characterize the business-as-usual conditions for the County, information on County population has been collected from the Southern California Association of Governments (SCAG). The County is projected to increase its population from approximately 10.6 million in 2010 to approximately 12.0 million in 2030.²⁸ Using the current CO_{2e} emissions factor of 14 metric tons per capita,²⁹ the County would be responsible for the emissions of approximately 149 million metric tons of CO_{2e} emissions in 2010 under a business-as-usual scenario, and each year, more GHGs would be expected to be emitted by the County than the previous year due to the increase in population (Table 3.7.3-1, *Characterization of Business-as-Usual and Target GHG Emissions for the County*). Using the target emissions necessary for compliance with AB 32 reduction goals,³⁰ the County would be responsible for approximately 141 million metric tons of CO_{2e} emissions in 2010 and 70 million metric tons of CO_{2e} emissions in 2030 (Table 3.7.3-1).

²⁷ California Air Resources Board. September 19, 2008. *California 1990 Greenhouse Gas Emissions Level and 2020 Limit*. Available at: <http://www.arb.ca.gov/cc/inventory/1990level/1990level.htm>

²⁸ Southern California Association of Governments. 2 June 2008. E-mail to William Meade, Sapphos Environmental, Inc. Pasadena, CA.

²⁹ California Air Resources Board. December 2008. *Climate Change Scoping Plan: A Framework for Change*. Available at: <http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm>

³⁰ California Air Resources Board. December 2008. *Climate Change Scoping Plan: A Framework for Change*, p. 118 Available at: <http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm>.

**TABLE 3.7.3-1
CHARACTERIZATION OF BUSINESS-AS-USUAL AND
TARGET GHG EMISSIONS FOR THE COUNTY**

	Year				
	2010	2015	2020	2025	2030
Population	10,615,700	10,971,589	11,329,802	11,678,528	12,015,892
CARB business-as-usual emission factor (metric tons of CO _{2e} /SP)	14	14	14	14	14
Total business-as-usual County GHG emissions (million metric tons of CO_{2e})	149	154	159	163	168
CARB target emission factors (metric tons of CO _{2e} /SP)	13.3	11.4	9.6	7.7	5.8
Total target County GHG emissions (million metric tons of CO_{2e})	141	126	108	90	70

KEY:

GHG = greenhouse gas

CARB = California Air Resources Board

SOURCES:

Southern California Association of Governments. 2 June 2008. E-mail to William Meade, Sapphos Environmental, Inc., Pasadena, CA.

California Air Resources Board. 2008. *Summary of Population, Employment, and GHG Emissions Projections Data*. Sacramento, CA.

3.7.4 Assessment Method and Models

The methodology to assess the refined project's impacts on GHG emissions has not been developed by the SCAQMD or by state or federal agencies with jurisdiction over the refined project site. Given the absence of an established methodology to evaluate GHG emission impacts of the refined project, the impacts were analyzed qualitatively by considering the refined project's construction and operational scenarios, size, and location. In an effort to provide guidance on how to quantitatively evaluate GHG emissions impacts of projects, in March and May 2008, the Office of the Attorney General provided public agencies with modeling tools that are recommended for evaluating public projects' potential impacts to global climate change.³¹ Among the modeling tools recommended by the Office of the Attorney General, two tools, URBEMIS (urban emissions) and EMFAC (Emissions Factors) software, are used in this analysis of the refined project's potential impacts to GHG emissions.

This analysis took into consideration the GHGs considered by AB 32, apart from HFCs, PFCs, and SF6, which are emitted from industrial processes or refrigeration equipment, and are therefore not relevant to the refined project. In order to calculate the CO₂, CH₄, and N₂O emission levels associated with electricity use during operation of the refined project, the Western Electricity Coordinating Council (WECC) California CO₂ electricity emission factor and the California CH₄ and

³¹ California Department of Justice, Office of the Attorney General. 21 May 2008. *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level*. Sacramento, CA.

N₂O electricity emission factors recommended by the CCAR were used.³² GHG emissions were reported as metric tons per year and metric tons per year per capita, in order to be consistent with the calculations used by international, state, and regional agencies, such as CAPCOA and the Bay Area Air Quality Management District.^{33,34} Metric tons per capita is a measure of the total emissions divided by the population served by the project, which, in the case of the refined project, would be the population of the County of Los Angeles. The per capita emissions provide a way to take into account the scale and context of a project.

URBEMIS 2007 Model

The CARB URBEMIS 2007, version 9.2.4, was used to estimate GHG emissions associated with implementation of the refined project. URBEMIS is a computer program that can be used to estimate emissions associated with land development projects in California such as residential neighborhoods, shopping centers, and office buildings; area sources such as gas appliances, wood stoves, fireplaces, and landscape maintenance equipment; and construction projects. The URBEMIS 2007 emissions model directly calculates CO₂ emissions. However, the URBEMIS 2007 model does not calculate CH₄ and N₂O emissions; therefore, the GHG emissions calculated by URBEMIS are reported as CO₂ emissions, not CO_{2e} emissions. CO₂ emissions reported from URBEMIS in this Addendum are essentially the same as CO_{2e} emissions because CH₄ and N₂O emissions from mobile sources are negligible in comparison to CO₂ emissions. The URBEMIS 2007 model was used for estimating construction and operational CO₂ emissions. Analysis of construction and operational impacts to GHG emissions are based on the construction and operational scenarios described as an element of Section 2.0, *Project Description*.

EMFAC 2007 Model

EMFAC 2007, version 2.3, was used to evaluate the refined project's GHG emission level contributed by mobile sources, such as passenger cars, based on the expected vehicle fleet mix, vehicle speeds, commute distances, and temperature conditions for the estimated start date of the refined project. EMFAC 2007, version 2.3, which is embedded within the URBEMIS 2007 emissions model, includes the CARB CO₂ emission factor. Therefore, the transportation-related CO₂ emissions impacts generated by implementation of the refined project were analyzed using the EMFAC 2007 model. In this analysis, fleet mix, vehicle speeds, and commute distances were based on the default values in the URBEMIS 2007 and EMFAC 2007 emissions models. In addition, information on daily vehicular trip generation rates and estimates described in Section 3.16, *Transportation and Traffic*, was used in EMFAC 2007 to estimate the amount of CO₂ emissions generated by mobile sources.

³² California Climate Action Registry. January 2009. "Indirect Emissions from Electricity Use." *California Climate Action Registry General Reporting Protocol: Reporting Entity-Wide Greenhouse Gas Emissions*. Version 3.1, Chapter 6. Los Angeles, California.

³³ California Air Pollution Control Officers Association. January 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. Sacramento, CA.

³⁴ Bay Area Air Quality Management District. 2 June 2010. "Adopted Air Quality CEQA Thresholds of Significance." San Francisco, CA.

3.7.5 Impact Analysis

Due to the absence of climate change legislation at the time that the certified EIR was approved, the EIR did not include a discussion of the potential of the approved project to emit GHGs. The potential impacts of the refined project to emit GHGs were analyzed in accordance with two questions that were added to the State CEQA Guidelines as part of the amendments that became effective on March 18, 2010.

Would the refined project:

- (a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Qualitative Impact Analysis of the Refined Project's Impacts on GHG Emissions

Demolition and Construction Activities

The refined project's incremental impact on GHG emissions would be significant if the size, the nature, or the duration of the construction phase would be expected to generate a substantial amount of GHG emissions. The area proposed for construction activities is approximately 49 acres, and the construction phase of the refined project would be expected to take approximately 5 years to complete, resulting in the potential for substantial increases in GHG emissions. However, during construction, normal construction equipment would be operated, and normal construction activities would be expected to occur. Although there is a relatively large area proposed for construction and a relatively long duration of proposed construction activities, the typical nature of the construction activities and equipment would not be expected to substantially increase GHG emissions. The refined project proposes less construction of new buildings than the approved project but requires more demolition activities. Calculations from the latest URBEMIS 2007 model (Appendix A, *URBEMIS 2007 Modeling Results*) indicate that the refined project would be expected to be responsible for an approximately 1.5-percent increase in GHG emissions during the demolition and construction phase as compared to the approved project.

Operation and Maintenance

During the operational phase of the refined project, the refined project would be expected to emit less than significant levels of GHGs since the refined project would require a more efficient and cost-effective provision of critical health care services and would be expected to incorporate energy-efficient appliances and measures to reduce long-term operational and maintenance costs for the County, identified as the first basic objective important to achieving the refined project goal. Energy-efficiency measures are considered as pre-mitigation measures to reduce or prevent GHG emissions associated with the refined project's operation. As the refined project calls for less new construction than the approved project and incorporates sustainable design, GHG emissions due to electricity use for the refined project would be expected to be less significant than the GHG emissions due to electricity use for the approved project. During operation of the refined project, mobile sources have the potential to result in a substantial amount of GHG emissions due to the anticipated 2,894 daily vehicular trips³⁵ to and from the refined project site (Section 3.16, *Traffic and Transportation*, Table 3.16-1, *Trip Generation Rates and Estimates*), and electricity

³⁵ Based on Table 3.16-1, *Trip Generation Rates and Estimates*, 2,362 estimated trips + 532 estimated trips = 2,894 estimated trips.

consumption could also be a major contributor to operation-related GHG emissions of the refined project. The refinements to the approved project would entail an approximately 50 percent reduction of hospital beds from the current 396 licensed beds to approximately 200 beds, potential Veteran Housing, and a reduction in the overall square footage of development on site, causing the daily vehicular trips and vehicle miles traveled (VMT) for the refined project to be reduced by approximately 38 percent (Section 3.16). Therefore, GHG emissions due to mobile sources for the refined project would be expected to be less significant than the GHG emissions due to mobile sources for the approved project.

Quantitative Impact Analysis of Refined Project's Impacts on GHG Emissions

Demolition and Construction Activities

The analysis of demolition- and construction-related GHG emissions was based on the operational scenario described in Section 2.0, *Project Description*. The project refinement would occur either concurrently or in two phases. During Phase I, existing vacated buildings would be demolished. Approximately 122,000 square feet of Outpatient Facilities would be constructed to house the outpatient services relocated from the demolished buildings. Phase I (see Section 2.11.1, *Project Description*) would incorporate the consolidation of the programming and demolition of approximately 521,000 square feet of existing buildings around the north campus. Phase I would also include the SSA Kitchen renovation. Phase II (see Section 2.11.2, *Project Description*) of the refined project consists of the construction, operation, and maintenance of the 56,000-square-foot JPI Building Expansion, the Harriman Building renovation, and the construction of the 175,365-square-foot potential Veteran Housing. Phase II would also include the renovation of the existing JPI Building to accommodate various hospital functions.

When evaluating GHG emissions with regards to demolition and construction activities, it is important to note that the demolition phase is substantially shorter than the construction phase. As described in Section 2.0, *Project Description*, demolition-related activities only take place during Phase I and are expected to last approximately 32 weeks. In contrast, Phase I construction-related activities are expected to last 36 months to 5 years and Phase II construction-related activities are expected to last 24 months to 4 years. Therefore, it is anticipated that the bulk of impacts related to GHG emissions would result from construction, with a much smaller proportion resulting from demolition. Therefore, although the refined project includes a greater square footage of demolition than the approved project, the net increase in GHG emissions would be minimal primarily due to the much longer time frame required for the construction phases and secondarily due to the reduced square footage of construction.

Using the latest URBEMIS 2007 model (Appendix A) and incorporating the construction scenario from the certified EIR,³⁶ the URBEMIS calculations shows that the demolition and construction activities associated with the approved project would be expected to result in a maximum of approximately 9,877.13 tons of CO_{2e} emissions per year during the demolition and construction phase (Table 3.7.5-1, *Anticipated CO_{2e} Emissions Associated with the Demolition and Construction Activities for the Approved Project and Refined Project*).³⁷

³⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

³⁷ Total CO_{2e}(metric tons) of CO₂ = 26.30 metric tons of CO₂ emissions x 1 (global warming potential [GWP])

Using the latest URBEMIS 2007 model (Appendix A) and incorporating the data provided by demolition and constructions scenario (see Section 2.0, *Project Description*), the URBEMIS calculations shows that demolition and construction activities associated with the refined project would be expected to result in a maximum of approximately 10,022.57 tons of CO_{2e} emissions per year during the demolition and construction phase (Table 3.7.5-1).³⁸ Based on the assumption that the approved project would require a similar construction scenario with similar equipment, CO_{2e} emissions associated with the construction phase would be expected to be similar for the approved project and the refined project.

**TABLE 3.7.5-1
ANTICIPATED CO_{2e} EMISSIONS ASSOCIATED WITH THE
DEMOLITION AND CONSTRUCTION ACTIVITIES FOR THE
APPROVED PROJECT AND REFINED PROJECT**

	Approved Project		Refined Project	
	Maximum Annual CO _{2e} Emissions (tons)	Maximum Annual CO _{2e} Emissions (tons per capita)*	Maximum Annual CO _{2e} Emissions (tons)	Maximum Annual CO _{2e} Emissions (tons per capita)*
Demolition and construction activities	9,877.13	0.00093	10,022.57	0.00094

NOTE: * Per capita emissions for construction are calculated using the projected 2010 County population data provided by the Southern California Association of Governments (SCAG). Demolition and construction activities were based on calculations provided by URBEMIS 2007. See Appendix A.

Operation and Maintenance

The analysis of operation- and maintenance-related GHG emissions was based on the operational scenario described in Section 2.0, *Project Description*. Operation- and maintenance-related GHG emissions associated with the refined project can be primarily attributed to mobile sources, primarily vehicles traveling to and from the project site; area sources; and electricity consumption, primarily used for space heating and cooling, lighting, and electrical appliances (Table 3.7.5-2, *Anticipated CO_{2e} Emissions Associated with the Operation and Maintenance for the Approved Project and Refined Project*).

³⁸ Total CO_{2e}(metric tons) of CO₂ = 26.30 metric tons of CO₂ emissions x 1 (global warming potential [GWP])

**TABLE 3.7.5-2
ANTICIPATED CO_{2e} EMISSIONS ASSOCIATED WITH THE OPERATION AND
MAINTENANCE FOR THE APPROVED PROJECT AND REFINED PROJECT**

	Approved Project		Refined Project	
	Maximum Annual CO _{2e} Emissions (tons)	Maximum Annual CO _{2e} Emissions (tons per capita)*	Maximum Annual CO _{2e} Emissions (tons)	Maximum Annual CO _{2e} Emissions (tons per capita)*
Operation and maintenance, including mobile sources ¹	8,386.05	0.00076	5,233.50	0.00049
Area sources ²	475.76	0.00004	723.55	0.00007
Electricity use ³	5,831.36	0.00053	4,964.38	0.00053
Total of operation and maintenance, area sources, and electricity use	14,693.17	0.00133	10,921.43	0.00109

NOTE: * Per capita emissions for operation and maintenance are calculated using the projected 2015 County population data provided by SCAG due to the completion of construction phase in 2014, which may be as late as 2020.

1. Operation and maintenance assumes mobile sources, vehicle miles traveled, and other sources such as number of beds within the project area. Operation and maintenance activities were based on calculations provided by URBEMIS 2007 (see Appendix A). Values are based on short tons, not metric tons, and assume 11 holidays and 354 operation days.

2. Area sources assume natural gas use and landscape maintenance equipment and consumer products. Area sources were based on calculations provided by URBEMIS 2007 (see Appendix A).

3. Electricity use is part of operation and maintenance, but it is calculated separately. Electricity use includes project electrical consumption, primarily used for heating, lighting, and appliances related to the approved and refined project. Electricity emission factors were calculated using recommended calculations established by *California Climate Action Registry General Reporting Protocol, Version 3.1*.

Using the latest URBEMIS 2007 model (Appendix A, *URBEMIS 2007 Modeling Results*) as previously described in this section, and assuming that there will be 200 hospital beds and 200 beds in an assisted care facility (proposed Veteran Home), it is anticipated that the operations and maintenance of the refined project would contribute a maximum of approximately 5,233.50 tons of CO_{2e} emissions per year (Table 3.7.5-2). This is in comparison to approximately 8,386.05 tons of CO_{2e} emissions per year that would be expected to result from operations and maintenance associated with the approved project, assuming that the approved project consists of 396 currently licensed hospital beds.

Area Sources

Quantification of area sources provides a way to measure cumulative impacts of a project by including local emissions sources such as gas appliances, wood stoves, fireplaces, and landscape maintenance equipment and consumer products. Annual CO_{2e} emissions due to area sources would be expected to be 723.55 for the refined project, compared to 475.76 for the approved project.

Electricity Use

The approved project allowed for a net increase of 350,183 square feet of medical facilities in comparison to the existing conditions at the time the certified EIR was written, which would result

in a total of approximately 1,365,029 square feet of facilities on the north campus.³⁹ Assuming average electricity use for a commercial facility⁴⁰ and using electricity emission factors from the CCAR,⁴¹ operation of the approved project would be expected to use approximately 48.43 megawatt-hours of electricity per day⁴² and would contribute approximately 5,831.36 metric tons of CO_{2e} emissions per year.

The refined project includes approximately 353,365 square feet of new construction (JPI Building Expansion, Outpatient Facilities, and potential Veteran Housing), 412,808 square feet of renovation (JPI Building, SSA Kitchen, Harriman Building, and Central Utility Plant), and 396,097 square feet of retained buildings (Safety Police Building and Parking Structure). Therefore, the refined project accounts for approximately 1,162,270 square feet of building space in total. Assuming average electricity use for a commercial facility,⁴³ operation of the refined project would be expected to use approximately 41.23 megawatt-hours of electricity daily.⁴⁴ Using the emission factors recommended by the CCAR,⁴⁵ electricity use associated with the refined project would be expected to be accountable for approximately 4,964.38 metric tons of CO_{2e} per year, which would be approximate 866.98 fewer metric tons of CO_{2e} per year than the approved project.

Therefore, as shown in Table 3.7.5-2, operation of the refined project associated with operation and maintenance, area sources, and electricity use would be expected to emit a maximum total of approximately 10,921.43 metric tons of CO_{2e} annually. This is in comparison to approximately 14,693.17 metric tons annually, associated with operation and maintenance, area sources, and electricity use for the approved project.

Leadership in Energy and Environmental Design

The refined project will obtain Leadership in Energy and Environmental Design (LEED) certification for newly constructed and renovated buildings. LEED requires that new construction or renovation projects achieve at least two Optimize Energy Performance points. The projects can achieve two points in this credit either by following a prescriptive compliance path or by demonstrating a percentage improvement in the proposed building performance rating compared to the baseline building performance rating of 14 percent or higher for new buildings or 7 percent or higher for existing building renovations.⁴⁶ Therefore, the electricity usage for the refined project would be expected to be at least 7 percent lower than calculated for the renovated buildings and at least 14 percent lower than calculated for new construction. The approved project did not propose to

³⁹ County of Los Angeles Internal Services Department. 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁴⁰ South Coast Air Quality Management District. 1993. *CEQA Air Quality Guidance Handbook*. Diamond Bar, CA.

⁴¹ California Climate Action Registry. January 2009. *California Climate Action Registry General Reporting Protocol, version 3.1*. Los Angeles, CA.

⁴² Megawatt hours per day = [building size (approximately 1,365,029 square feet) x 12.95 kilowatt hour/square foot/year] * 1 kilowatt/1000 megawatts * 1 year/365 days

⁴³ South Coast Air Quality Management District. 1993. "Table A9-11-A." *CEQA Air Quality Handbook*. Diamond Bar, CA.

⁴⁴ Megawatt hours per day = [building size (approximately 1,162,270 square feet) x 12.95 kilowatt hour/square foot/year] * 1 kilowatt/1000 megawatts * 1 year/365 days

⁴⁵ California Climate Action Registry. January 2009. *California Climate Action Registry General Reporting Protocol: Reporting Entity-Wide Greenhouse Gas Emissions*. Version 3.1. Los Angeles, CA.

⁴⁶ US Green Building Council, Leadership in Energy and Environmental Design Green Building Rating System. October 2007. *New Construction and Major Renovations*. Washington DC.

obtain such reductions in energy use; therefore, the refined project is anticipated to be more energy efficient and emit less resultant CO_{2e} than the approved project.

Mitigation Measures

Incorporation of mitigation measures specified in the certified EIR⁴⁷ would be expected to not only reduce emissions of criteria pollutants to below the level of significance but also reduce CO_{2e} emissions of the refined project to below the 1990 levels, as the co-benefits of reducing criteria pollutants' emissions may substantially reduce GHG emissions.⁴⁸ In addition to recognizing this potential co-benefit, inclusion of 19 of the Office of the Attorney General's 50 project-level recommendations to local agencies for addressing global warming impacts in the refined project design would further decrease the refined project's emissions profile:⁴⁹

- Design buildings to be energy efficient; site buildings to take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use;
- Install efficient lighting and lighting control systems; use daylight as an integral part of lighting systems in buildings;
- Install light-colored "cool" roofs, cool pavements, and strategically placed shade trees;
- Install energy-efficient heating and cooling systems, appliances and equipment, and control systems;
- Limit the hours of operation of outdoor lighting;
- Use combined heat and power in appropriate applications;
- Create water-efficient landscapes;
- Design buildings to be water-efficient; install water-efficient fixtures and appliances;
- Restrict watering methods (e.g., prohibit systems that apply water to nonvegetated surfaces) and control runoff;
- Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment (retaining storm water runoff on site can drastically reduce the need for energy-intensive imported water at the site;

⁴⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁴⁸ California Air Resources Board. 25 April 2008. *Summary of ARB Work to Fulfill AB 32 Evaluation Requirements: Technical Stakeholder Workgroup Meeting, April 25, 2008*. Available at: http://www.arb.ca.gov/cc/scopingplan/economics-sp/meetings/042508/evaluations_April_25_final.pdf

⁴⁹ California Department of Justice Office of the Attorney General. 21 May 2008. *The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level*. Sacramento, CA.

- Devise a comprehensive water conservation strategy appropriate for the project and location; the strategy may include many of the specific items listed above, plus other innovative measures that are appropriate to the specific project;
- Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard);
- Provide interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas;
- Include mixed-use, infill, and higher density in development projects to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and promote efficient delivery of services and goods;
- Preserve and create open space and parks; preserve existing trees, and plant replacement trees at a set ratio;
- Limit idling time for commercial vehicles, including delivery and construction vehicles;
- Use low- or zero-emission vehicles, including construction vehicles;
- Promote ride sharing programs, for example, by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride sharing vehicles, and providing a Web site or message board for coordinating rides; and
- For commercial projects, provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience; for large employers, provide facilities that encourage bicycle commuting, including, for example, locked bicycle storage or covered or indoor bicycle parking.

Level of Significance

As indicated in Table 3.7.5-1, it is expected that the refined project would emit less CO_{2e} than the approved project due to a reduction in emissions from mobile sources and electricity use during operation of the refined project. In addition, the County anticipates using energy-efficient and sustainable measures to be incorporated into the refined project design and operation to increase water and energy use efficiency. Because the URBEMIS 2007 model does not consider energy-efficient and sustainable measures in its formulas, the actual CO_{2e} emissions would be expected to be less than that predicted by the model. In conclusion, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to construction or operational GHG emissions, and no new mitigation is required.

- (b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The refined project would not be expected to result in new or substantially more adverse significant impacts to GHG emissions in relation to conflicting with an applicable plan, policy, or regulation from those disclosed in the certified EIR. As indicated in Table 3.7.5-1, it is expected

that the refined project would emit less CO_{2e} than the approved project due to a reduction in emissions from mobile sources and electricity use during operation of the refined project. In addition, the County anticipates using energy-efficient and sustainable measures to be incorporated into the refined project design and operation to increase water and energy use efficiency. Incorporation of green building design principles and utilization of energy-efficient equipment during operation of the refined project would be expected to be consistent with the County Energy and Environmental Policy, particularly with the Energy and Water Efficiency Program, the Environmental Stewardship Program, and the Sustainable Design Program set forth in the policy. The annual CO_{2e} emissions for the refined project would be approximately 0.001 metric ton per capita, which is compatible with the plan to reduce statewide emissions to 1990 levels (approximately 10 metric tons per capita) by 2020 as required by AB 32), and is also consistent with the County's Energy and Environmental Policy. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to GHG emissions related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

3.8 HAZARDS AND HAZARDOUS MATERIALS

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to hazards and hazardous materials from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Hazards and hazardous materials at the refined project site were evaluated based on expert opinion supported by facts and review of federal, state, and local environmental regulatory databases,^{2,3} and review of the County of Los Angeles General Plan.⁴

Hazardous waste is a by-product of society that can pose a potential or substantial hazard to human health or the environment when improperly managed. Designated hazardous waste possesses at least one of four defined characteristics—ignitability, corrosivity, reactivity, or toxicity—or appears on special U.S. Environmental Protection Agency lists.⁵

The potential for the refined project to result in new or substantially more adverse significant impacts related to hazards and hazardous materials was evaluated in relation to eight questions recommended for consideration by the State California Environmental Quality Act (CEQA) Guidelines:⁶

Would the refined project:

- (a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The refined project would not be expected to result in new or substantially more adverse significant impacts to hazards and hazardous materials in relation to a hazard that could affect the public or the environment through the routine transport, use, or disposal of hazardous materials from those disclosed in the certified EIR. The refined project would reduce the total square footage of construction from that approved in 1992.⁷ The refined project would result in the demolition of Buildings 500, 600, 700, 800, and 900. As with the approved project, all demolished buildings would be subject to a Comprehensive Building Asbestos Survey prior to demolition or renovation activities, and all asbestos would be required to be abated or encapsulated.

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² BBL Environmental Information. 11 January 2007. Environmental Record Search, 7601 E. Imperial Highway, Downey. Solana Beach, CA.

³ Environmental Data Resources Inc. 14 July 2011. *EDR Report for Rancho Los Amigos North Campus, Downey, CA 90242*. Inquiry No.3122215.1s. Milford, CT.

⁴ County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

⁵ *Code of Federal Regulations*, Title 40, Chapter 1, Part 261.

⁶ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

Table 3.8-1, *Hazardous Materials Storage Tanks Located at the Refined Project Site*, lists the locations of hazardous materials storage tanks on the north campus. As with the approved project,⁸ the refined project shall continue to adhere to applicable underground storage tank (UST) regulations to ensure that these tanks are in conformance with federal, state, and local regulations until the USTs are removed and/or replaced with approved USTs. In the event that USTs are removed as a result of the refined project construction, all federal, state, and local regulations regarding UST removal, soil sampling, and necessary remedial actions shall be followed. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to hazards and hazardous materials in relation to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

**TABLE 3.8-1
HAZARDOUS MATERIALS STORAGE TANKS LOCATED AT THE REFINED PROJECT SITE**

Tank Location	Tank Contents	Aboveground/Underground	Tank Size (Gallons)
North of central plant	Liquid oxygen	Aboveground	1,500 and 9,000 (2 tanks)
Central plant	Sulfuric acid	Aboveground	500
Central plant: west of buildings 700 and 900, east of building 502, north of building 602	Diesel fuel	All underground	80,000 (7 tanks)

Source: Sweeney, Bob, Manager, Rancho Los Amigos National Rehabilitation Center. 7 September 2010. Hazardous Materials Locations.

- (b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The refined project would not be expected to create a new or substantially more adverse significant impact to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials from that disclosed in the certified EIR.⁹ In addition to asbestos-containing materials, the certified EIR described the use and storage of hazardous materials in Buildings 100 and 500 and in some building basements. The EIR included a requirement for a Hazardous Materials Plan to be in place for the storage, handling, and removal of hazardous materials.¹⁰ As with the approved project, site-specific investigations would be required to ensure that new construction would not pose a risk or hazard to people or property. The refined project would reduce the total square footage of new development. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse impacts to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

⁸ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁰ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

- (c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The refined project would not be expected to create a new or substantially more adverse significant impact from the emission of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school from that disclosed in the certified EIR.¹¹ As with the approved project, there are no identified existing or proposed schools located within 0.25 mile of the refined project site. The nearest school, Old River Elementary School, is located at 11995 Old River School Road, approximately 0.4 mile north of the refined project site. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse impacts related to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.

- (d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The refined project would not be expected to create a new or substantially more adverse significant impact related to being located on a site that is included on a list of hazardous materials sites from that disclosed in the certified EIR.¹² Government database listings of hazardous materials were reviewed to determine the locations of hazardous materials sites within 0.5 mile of the refined project site.^{13,14} Based on the 2011 Environmental Data Resources Report,¹⁵ there are no hazardous waste sites located on the refined project site pursuant to Government Code Section 65962.5. However, there are several known leaking underground storage tanks (LUSTs) and USTs located less than 0.1 mile from the boundary of the north campus that could potentially impact the refined project (Table 3.8-2, *Known and Potentially Contaminated Sites within 0.5 Mile of the Refined Project Boundary*). In the event that contamination is unexpectedly encountered during construction, all federal, state, and local regulations shall be followed to ensure that workers are not exposed to hazardous materials and such materials are properly handled and disposed in accordance with all applicable requirements. Therefore, as with the approved project, the refined project would not be expected to result in new or substantially more adverse impacts related to being located on a hazardous waste site.

¹¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹² County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹³ BBL Environmental Information. 11 January 2007. Environmental Record Search, 7601 E. Imperial Highway, Downey. Solana Beach, CA.

¹⁴ Environmental Data Resources Inc. 14 July 2011. *EDR Report for Rancho Los Amigos North Campus, Downey, CA 90242*. Inquiry No.3122215.1s. Milford, CT.

¹⁵ Environmental Data Resources Inc. 14 July 2011. *EDR Report for Rancho Los Amigos North Campus, Downey, CA 90242*. Inquiry No.3122215.1s. Milford, CT.

**TABLE 3.8-2
KNOWN AND POTENTIALLY CONTAMINATED SITES WITHIN 0.5 MILE
OF THE REFINED PROJECT BOUNDARY**

No.	Name of Site	Location	Source	Status	Distance from Refined Project Boundary
1	North campus – 7601 Imperial Highway	Building 700 – Diesel fuel	UST1	Not leaking as of 1999	0 miles
2	North campus – 7601 Imperial Highway	Building 602– Diesel fuel	UST1	Not leaking as of 1999	0 miles
3	North campus – 7601 Imperial Highway	Building 900– Diesel fuel	UST1	Not leaking as of 1999	0 miles
4	North campus – 7601 Imperial Highway	Building 502– Diesel fuel	UST1	Not leaking as of 1999	0 miles
5	North campus – 7601 Imperial Highway	Central Plant– Diesel fuel	3 USTs1	Not leaking as of 1999	0 miles
6	North campus – 7601 Imperial Highway	North of Central Plant – Liquid Oxygen	2 ASTs1	Not leaking as of 1999	0 miles
7	North Campus – 7601 Imperial Highway	Central Plant – Sulfuric Acid	AST1	Status Unknown	0 miles
8	South campus – 7601 Imperial Highway	Main Kitchen– Diesel fuel	UST1	Status Unknown	0.3 mile SW
9	South campus – 7601 Imperial Highway	Descanso and Juniper	LUST2	Remedial action (cleanup) underway	0.4 mile SW
10	Simaan Auto Supply	7395 Imperial Highway	LUST2, UST2	Case closed	0.1 mile W
11	Evolution Recycling, Inc.	7900 Imperial Highway	SWRCY2	Unknown	0.2 mile SE
12	Techni-Cast Corporation	11220 South Garfield Avenue	Envirostor (known contamination)2	Status unknown	0.5 mile W-SW
13	Diversey Chemical Company	5720 East Imperial Highway	CERCLIS NFRAP, Envirostor (known contamination)2	No further action planned	0.5 mile W
14	ARCO Products Company	12603 Paramount Boulevard	LUST2,, HIST CORTESE2	Case closed	0.3 mile E-SE
15	Thrifty Service Station	8010 East Imperial Highway	LUST2, HIST CORTESE2	Remediation	0.3 mile E-SE
16	Anadite, Inc.	10647 South Garfield Avenue	CERCLA2,, HIST CORTESE2 SLIC2	Assessment, interim remedial action	0.4 mile W-SW
17	County of Los Angeles Probation Department and Juvenile Hall	7285 Quill Drive	UST2, HIST UST2	Status unknown	<0.1 mile NW
18	Los Amigos County Golf Course	7295 Quill Drive	UST2, HIST UST2	Status unknown	<0.1 mile N-NW
19	City of Downey property	12515 Smallwood Avenue	UST2, HIST UST2	Status unknown	0.1 mile E-SE
20	Granitize Products Inc.	11022 Vulcan Street	LUST2	Site Assessment	0.4 mile W
21	Jim’s Smog Center	5825 East Imperial Highway	LUST2	Remediation	0.3 mile W
22	D.K. Precision and Bergsen	10710-10720 Sessler Street	LARWQCB, SLIC2	Site Assessment	0.5 mile W-NW
23	Los Angeles County Downey Municipal Court	7600 Imperial Highway	UST2	Status unknown	<0.1 mile S-SW
24	Shell Service Station	7395 E. Imperial Highway	UST2	Status Unknown	<0.1 mile W
25	City of Downey Fire Station	12222 Paramount Boulevard South	LUST Cleanup 2	Case Closed	0.4 miles E

KEY:

AST: aboveground storage tank
CERC-NFRAP: CERCLIS No further remedial action planned
E = east
ENVIROSTOR: California DTSC database of known or suspected contamination
Historical LUST: Historical Leaking Underground Storage Tank
LARWQCB – Los Angeles Regional Water Quality Control Board
LUST: Leaking Underground Storage Tank
mi. = mile
N = north
NE = northeast
NW = northwest
S = south
SE = southeast
SLIC: Spills Leaks Investigations Cleanup
SW = southwest
SWRCY: Recycler Database
UST: underground storage tank
W = west

SOURCES:

¹ Sweeney, Bob, Manager, Rancho Los Amigos National Rehabilitation Center. 7 September 2010. Hazardous Materials Locations.
² Environmental Data Resources Inc. 14 July 2011. *EDR Report for Rancho Los Amigos South Campus, Downey, CA 90242*. Inquiry No.3122215.1s. Milford, CT.

- (e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

The refined project would not be expected to create a new or substantially more adverse significant safety hazard for people residing or working in the refined project area due to impacts resulting from the refined project being located within an airport land use plan or within 2 miles of a public airport or public use airport from that disclosed in the certified EIR.¹⁶ As with the approved project, the refined project site is not located within an airport land use plan or within 2 miles of a public airport. The nearest public airports are the Compton/Woodley Airport located approximately 5.3 miles to the southwest and the Long Beach Municipal Airport located approximately 7.1 miles to the south-southwest (Figure 3.8-1, *Airports Near Refined Project Area*) of the refined project site. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse impacts related to being located within 2 miles of a public or public use airport.

- (f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

The refined project would not be expected to create a new or substantially more adverse significant safety hazard for people residing or working in the refined project area due to the refined project being located within the vicinity of a private airstrip from that disclosed in the certified EIR. The refined project would affect the same area analyzed in the certified EIR.¹⁷ The nearest private airstrip is Shepherd Field located in El Monte, California, approximately 7.8 miles northwest of the refined project site (Figure 3.8-1). Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse impacts related to being located within the vicinity of a private airstrip.

¹⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

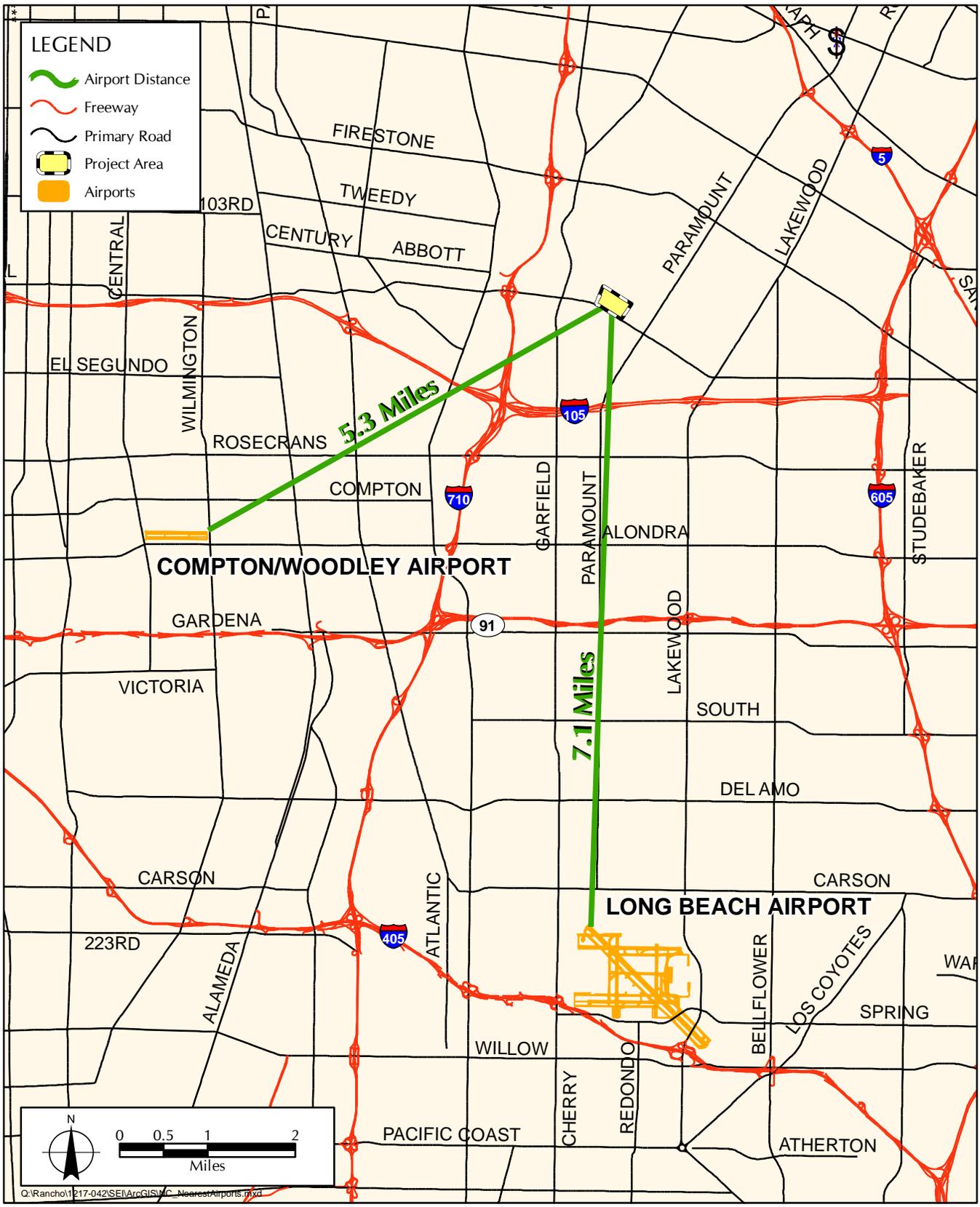


FIGURE 3.8-1
Airports Near Refined Project Area

- (g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The refined project would not be expected to create a new or substantially more adverse significant impact that would impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan from that disclosed in the certified EIR.¹⁸ Refined project elements would not be designated as an emergency staging area and would not contain elements that are anticipated to interfere with local emergency response or evacuation routes.¹⁹ The refined project would not be expected to physically impede existing emergency response plans, emergency vehicle access, or personnel access to the refined project site.²⁰ Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to hazards and hazardous materials related to an adopted emergency response plan or emergency evacuation plan.

- (h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The refined project would not be expected to expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. The refined project would affect the same area analyzed in the certified EIR.²¹ A review of the County of Los Angeles Fire Hazard Maps indicates that land uses typically subject to wildland fires are absent from the refined project area.²² Therefore, compared with the approved project, the refined project would not be expected to expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

¹⁸ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁹ County of Los Angeles Department of Regional Planning. 1990. *County of Los Angeles General Plan, Safety Element*. Los Angeles, CA.

²⁰ Roe, Robert, City of Downey Fire Department. 16 January 2007. Personal communication with Lorraine Cope, Sapphos Environmental, Inc., Pasadena, CA.

²¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²² California Department of Forestry and Fire Protection. 2007. *Los Angeles County Fire Hazard Severity Zone Map*. Available at: http://www.fire.ca.gov/fire_prevention/fhsz_maps/fhsz_maps_losangeles.php

3.9 HYDROLOGY AND WATER QUALITY

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to hydrology and water quality from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Hydrology and water quality at the refined project site were evaluated in relation to the Safety Element of the County of Los Angeles (County) General Plan,² the California Regional Water Quality Control Board Basin Plan for the Los Angeles Region,³ National Flood Insurance Program Flood Insurance Rate Maps for the County,⁴ and the U.S. Geological Survey 7.5-minute series topographic quadrangles for the refined project area.^{5,6}

The potential for the refined project to result in new or substantially more adverse significant impacts related to hydrology and water quality was evaluated in relation to 10 questions recommended for consideration by the State California Environmental Quality Act (CEQA) Guidelines:⁷

Would the refined project:

- (a) Violate any water quality standards or waste discharge requirements?

The refined project would not be expected to create new or substantially more adverse significant impacts to hydrology and water quality in relation to water quality standards or waste discharge requirements from those disclosed in the certified EIR.⁸

The refined project would require additional demolition but would not result in additional construction. The quality of storm water runoff is regulated under the National Pollution Discharge Elimination System (NPDES) permit (CAS614001, Order No. 1-182) issued to the County by the Los Angeles Regional Water Quality Control Board, which provides a mechanism for establishing appropriate controls and monitoring for the discharge of pollutants to the storm water runoff system. The County requires all development projects within its jurisdiction on sites of 1 acre or larger to comply with the NPDES requirements for construction and operations as appropriate. The approved project would have required grading on most of the north campus (see Figures 2 through

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² County of Los Angeles Department of Regional Planning. 1990. *County of Los Angeles General Plan, Safety Element*. Los Angeles, CA.

³ California Regional Water Quality Control Board, Los Angeles Region(4). 13 June 1994. *Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*. Los Angeles, CA.

⁴ National Flood Insurance Program. [26 September 2008] Accessed 8 July 2011. *Flood Insurance Rate Map, City of Downey, California, Los Angeles County*. Community Panel No. 06037C1820F. Available at: <http://www.msc.fema.gov/>

⁵ U.S. Geological Survey. [1964] Photorevised 1981. *7.5-minute Series, South Gate, California, Topographic Quadrangle*. Reston, VA.

⁶ U.S. Geological Survey. [1965] Photorevised 1981. *7.5-minute Series, Whittier, California, Topographic Quadrangle*. Reston, VA.

⁷ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

⁸ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

15 in the Rancho Los Amigos Medical Center Draft EIR).⁹ The refined project would affect most of the 49-acre portion of Rancho Los Amigos and would therefore be subject to compliance with the County's NPDES permit (see Figure 2.4-1, *North Campus Consolidation, Construction, and Renovation*).

Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to water quality standards or waste discharge requirements.

- (b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

The refined project would not be expected to create new or substantially more adverse significant impacts related to groundwater supplies or groundwater recharge during the construction and operation of the refined project from those disclosed in the certified EIR.¹⁰ The refined project includes the reduction in size of the Jacquelin Perry Institute (JPI) Building Expansion and the demolition of additional buildings not previously analyzed in the certified EIR.¹¹ As indicated in Section III.I.9, *Water*, of the certified EIR, Rancho Los Amigos and other nearby uses are served by the Rancho Water System, which is owned and operated by the County and the Metropolitan Water District of Southern California (MWD). The EIR analysis was based on fiscal year 1989/1990, when the well draw by the Rancho Water System was 514.0 acre-feet and 551.3 acre-feet of MWD water was used. Cumulative projects, including the approved project, were estimated to create a net demand of 415,000 gallons of water per day or 152 million gallons per year. Compared with the approved project, the refined project would reduce the total area of buildings on the north campus from approximately 1,365,029 square feet¹² to approximately 1,116,270 square feet.¹³ As with the approved project, the refined project would continue to require implementation of the specified mitigation measures for water provisions and infrastructure upgrades, prior to occupancy of the JPI Building Expansion and Outpatient Facilities. Therefore, the additional demolition and proposed renovations would not be expected to deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to groundwater levels.

⁹ County of Los Angeles Internal Services Department. December 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁰ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹² County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹³ The refined project includes approximately 178,000 square feet of new construction (JPI Extension and outpatient facilities), 379,532 square feet of renovation (JPI Building, Harriman Building, and Single Services Annex Kitchen), and 35,783 square feet of retained buildings (Central Plant and Safety Police Office). Therefore, the refined project accounts for approximately 593,315 square feet of building space in total.

- (c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

The refined project would not be expected to create new or substantially more adverse significant impacts related to the alteration of existing drainage patterns in a manner that would result in substantial erosion or siltation on or off site from those disclosed in the certified EIR.¹⁴ The refined project includes redevelopment of a 49-acre area, including the 56,000-square-foot, two- to three-story JPI Building Expansion and demolition of several structures. As approved, approximately 35 percent (roughly 17 acres) of the 49-acre north campus would have been impervious. The refined project would not be expected to result in a substantial change in overall impervious surface area, although it would be anticipated that the impervious area would be reduced as a result of the additional demolition and reduced construction that are part of the refined project. Therefore, an alteration to the existing drainage pattern would not be expected to result from implementation of the refined project. The areas where additional buildings would be demolished would be rough graded to maintain the existing drainage pattern on the site and hardscaped or landscaped to prevent erosion. In addition, the refined project would be required to include best management practices (BMPs) through the design and implementation of the Standard Urban Storm Water Management Plan prepared consistent with the requirements of the applicable NPDES permit. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to alteration of existing drainage patterns in a manner that would result in substantial erosion or siltation on site or off site.

- (d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

The refined project would not be expected to create new or substantially more adverse significant impacts related to altering the drainage patterns of the site or substantially increasing the rate or amount of surface runoff in a manner that would result in flooding on site or off site from those disclosed in the certified EIR.¹⁵ As indicated in Section II, *Project Description*, subsection B, *Project Location and Existing Uses*, of the certified EIR, the 49-acre north campus is an existing developed medical center with no rivers or streams crossing the property.¹⁶ The nearest river is the Los Angeles River located approximately 0.5 mile to the west. The areas where additional buildings would be demolished would be rough graded to maintain the existing drainage pattern on the site. In comparison to the approved project, the refined project includes the reduction in size of the JPI Building Expansion and demolition of additional structures. This would not be expected to result in a substantial change in overall impervious surface area, although it would be anticipated that the impervious area would be reduced as compared with the approved project and, thus, would not be expected to affect surface water runoff.¹⁷ In addition, the refined project would also be subject to BMPs through the design and implementation of the Standard Urban Storm Water Management Plan prepared consistent with the requirements of the applicable NPDES permit.

¹⁴ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to the alteration of existing drainage patterns of the refined project site or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site.

- (e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

The refined project would not be expected to create new or substantially more adverse significant impacts related to exceeding the capacity of existing or planned storm water drainage systems or providing substantial additional sources of polluted runoff from that disclosed in the certified EIR.¹⁸ The refined project would not be expected to result in a substantial change in overall impervious surface area, although it would be anticipated that the impervious area would be reduced in comparison to the approved project due to the increase in square footage of proposed demolition and the retention of the Harriman Building originally approved for demolition.¹⁹ Therefore, contribution to an exceedance in runoff would not be expected to result from the overall change in building coverage and paved areas for the refined project. Section III.F, *Geology/Soils/Seismicity*, of the certified EIR determined that adequate storm water capacity exists south and west of the refined project site to carry the storm water runoff.²⁰ The intersection of Quill Drive and Rives Avenue (northeast of the refined project site) has experienced flooding even during periods of moderate rainfall. As a result of flood improvements being made at this intersection and within the refined project site vicinity, this area is currently capable of providing a 100-year or greater level of flood protection as required by the Federal Emergency Management Agency (FEMA).²¹ As with the approved project, specified mitigation measures requiring existing storm drain facilities to be upgraded to adequately transport storm water runoff to existing County storm drain facilities on Imperial Highway and Old River School Road would be required.

The quality of storm water runoff is regulated under the NPDES storm water permit issued to the County, which provides a mechanism for establishing appropriate controls and monitoring for the discharge of pollutants to the storm water runoff system. The County requires all development projects within its jurisdiction on sites of 1 acre or larger to comply with the NPDES requirements for construction and operations, as appropriate, and design and implementation of the Standard Urban Storm Water Management Plan prepared consistent with the requirements of the applicable NPDES permit. Thus, the refined project would be required to conform to the County's NPDES storm water permit.

Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to exceeding the capacity of existing or planned storm water drainage systems or providing substantial additional sources of polluted runoff.

¹⁸ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁰ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²¹ National Flood Insurance Program. [26 September 2008] Accessed 8 July 2011. *Flood Insurance Rate Map, City of Downey, California, Los Angeles County*. Community Panel No. 06037C1820F. Available at: <http://www.msc.fema.gov/>

(f) Otherwise substantially degrade water quality?

The refined project would not be expected to create new or substantially more adverse significant impacts related to the degradation of water quality from those disclosed in the certified EIR. In accordance with the certified EIR, the refined project would include the implementation of the Standard Urban Storm Water Management Plan prepared consistent with the requirements of the applicable NPDES permit.²² This provision would ensure that no substantial amount of polluted runoff would be generated during construction. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to substantial degradation of water quality.

(g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

The refined project would not be expected to create new or substantially more adverse significant impacts related to the placement of housing within a 100-year flood hazard area from those disclosed in the certified EIR.²³ As indicated in the certified EIR, the majority of the approved project site was located outside of the 100-year flood zone; however, approximately 10 percent of the approved project site (the portion of the site adjacent to Old River School Road) was located within the 100-year flood zone.²⁴ Since the certification of the EIR in 1992, flood improvements have been made at the intersection of Quill Drive and Rives Avenue and within the vicinity of the refined project site; therefore, this area is currently capable of providing a 100-year or greater level of flood protection as required by FEMA.²⁵ The refined project does not include the construction of housing or result in the redirection of flood flows toward residential areas. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to placement of housing within a 100-year flood hazard area.

(h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

The refined project would not be expected to create new or substantially more adverse significant impacts related to the placement of structures that would impede or redirect flood flows within a 100-year flood hazard area from those disclosed in the certified EIR.²⁶ As indicated in Figure 52, *Flood Plain Map*, of the Draft EIR,²⁷ the majority of the approved project site was located outside of

²² County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA, page 126

²³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁴ National Flood Insurance Program. [26 September 2008] Accessed 8 July 2011. *Flood Insurance Rate Map, City of Downey, California, Los Angeles County*. Community Panel No. 06037C1820F. Available at: <http://www.msc.fema.gov/>

²⁵ National Flood Insurance Program. [26 September 2008] Accessed 8 July 2011. *Flood Insurance Rate Map, City of Downey, California, Los Angeles County*. Community Panel No. 06037C1820F. Available at: <http://www.msc.fema.gov/>

²⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁷ County of Los Angeles Internal Services Department. December 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

the 100-year flood hazard area;²⁸ however, approximately 10 percent of the approved project site, the portion adjacent to old river school road, was within the 100-year flood zone.²⁹ As specified in the certified EIR, the Central Utility Plant, corporation yard, and landscaping were constructed in that area consistent with the Uniform Building Code requirements for flood proofing of such facilities.³⁰ Since the time the EIR was certified in 1992, flood control channels have been improved; therefore, this area is currently capable of providing a 100-year or greater level of flood protection as required by FEMA.³¹ The refined project would be constructed in accordance with applicable state requirements, including the Uniform Building Code flood zone requirements. Compliance with existing standards and requirements would ensure an adequate level of protection from flood hazards. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to placement of structures (other than housing) within a 100-year flood hazard area.

- (i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

The refined project would not be expected to create new or substantially more adverse significant impacts related to exposing people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam, from those disclosed in the certified EIR.³² As with the approved project, the refined project would not be expected to result in the placement of new structures or people in areas of increased risk of flooding as a result of the failure of a levee or dam. The refined project would be constructed in accordance with applicable state requirements, including the Uniform Building Code flood zone requirements. Compliance with existing standards and requirements would ensure an adequate level of protection from flood hazards. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to the failure of a levee or dam.

- (j) Inundation by seiche, tsunami, or mudflow?

The refined project would not be expected to create new or substantially more adverse significant impacts related to inundation by seiche, tsunami, or mudflow from that disclosed in the certified EIR.³³ The topography of the refined project site has relatively flat terrain, with shallow downward slopes in a westerly direction. Based on a review of U.S. Geological Survey 7.5-minute series, South Gate, California, and Whittier, California, topographic quadrangles, in which the refined project site is located, as well as a review of aerial photographs of the site and site visits, the refined project site is not located within a steep or hilly area that would be susceptible to

²⁸ National Flood Insurance Program. [26 September 2008] Accessed 8 July 2011. *Flood Insurance Rate Map, City of Downey, California, Los Angeles County*. Community Panel No. 06037C1820F. Available at: <http://www.msc.fema.gov/>

²⁹ National Flood Insurance Program. [26 September 2008] Accessed 8 July 2011. *Flood Insurance Rate Map, City of Downey, California, Los Angeles County*. Community Panel No. 06037C1820F. Available at: <http://www.msc.fema.gov/>

³⁰ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

³¹ National Flood Insurance Program. [26 September 2008] Accessed 8 July 2011. *Flood Insurance Rate Map, City of Downey, California, Los Angeles County*. Community Panel No. 06037C1820F. Available at: <http://www.msc.fema.gov/>

³² County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

³³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

mudslides or landslides.^{34,35} Mudslides and landslides are not considered to be a potential hazard at the refined project site and would not be expected to affect any refined project components. The refined project site is not located near coastlines, lakes, and/or flood control basins or adjacent to any steep-sided slopes covered with soils and/or vegetation. Thus, as with the approved project, there is no potential for impacts to hydrology and water quality in relation to the inundation by seiche, tsunami, or mudflow. Therefore, the refined project would not be expected to result in new or substantially more adverse significant impacts related to inundation by seiche, tsunami, or mudflow.

³⁴ U.S. Geological Survey. [1964] Photorevised 1981. *7.5-minute Series, South Gate, California, Topographic Quadrangle*. Reston, VA.

³⁵ U.S. Geological Survey. [1965] Photorevised 1981. *7.5-minute Series, Whittier, California, Topographic Quadrangle*. Reston, VA.

3.10 LAND USE AND PLANNING

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to land use and planning from those disclosed in the project described in the certified Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Land use and planning at the refined project site was evaluated in light of the adopted published maps and adopted plans, including the County of Los Angeles General Plan,² County of Los Angeles Land Use Policy Map,³ and the City of Downey (City) General Plan (Downey Vision 2025).⁴

The potential for the refined project to result in new or substantially more adverse significant impacts related to land use and planning was evaluated in relation to three questions recommended for consideration by the State California Environmental Quality Act (CEQA) Guidelines:⁵

Would the refined project:

- (a) Physically divide an established community?

Compared with the approved project, the refined project would not be expected to create new or substantially more adverse significant impacts to land use and planning through the physical division of an established community. The refined project would affect the same area analyzed in the certified EIR.⁶ The refined project would be located on County of Los Angeles (County) property that is designated for hospital use. Construction and demolition would not be expected to impact any other parcels and would not be expected to create a temporary barrier in the neighborhood. In addition, the refined project would not be expected to create a permanent division between neighboring parcels, as the refined site would continue to function as a medical facility as it is currently operated. Thus, the refined project would be situated in a manner that is compatible with existing land uses. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to the physical division of an established community.

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

³ County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles Land Use Policy Map*. Los Angeles, CA. Available at: http://planning.lacounty.gov/assets/upl/project/gp_web80-land-use-policy-map-5.pdf

⁴ City of Downey Planning Department. Adopted 25 January 2005. *Downey Vision 2025*. Available at: http://www.downeyca.org/gov/cd/planning/general_plan_n_map/default.asp

⁵ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

- (b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to a conflict with adopted or proposed land use plans, policies, or regulations. The refined project would affect the same area analyzed in the certified EIR. The North Campus is completely built out and used exclusively for hospital- and medical-related purposes. The refined project would affect the same area analyzed in the certified EIR.⁷ The refined project site is located within the County of Los Angeles; therefore, development in the area is governed by the policies, procedures, and standards set forth in the County General Plan.⁸ The Land Use Policy map in the County General Plan describes dominant land use characteristics within the County and provides a policy framework for developing area-wide, community, and neighborhood plans.⁹ The refined project site has been designated as “public and semi-public facilities” in the County General Plan.¹⁰ The refined project would be developed with medical inpatient and outpatient facilities and appurtenant facilities consistent with the “public and semi-public facilities” land use designation. Before the start of construction, the County will submit the refined project to the City of Downey in accordance with and subject to California Government Code Section 65402(b). The refined project site’s County General Plan designation of “public and semi-public facilities” allows for “major existing and proposed public and semi-public uses, including airports and other major transportation facilities, solid and liquid waste disposal sites, utilities, public buildings, public and private educational institutions, religious institutions, hospitals, detention facilities, and fairgrounds.” The refined project also conforms to the County of Los Angeles Zoning Ordinance. The refined project would not be expected to conflict with any applicable land use plan, policy, or regulation, as they are consistent with the current zoning and land use designations. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to a conflict with adopted or proposed land use plans, policies, or regulations.

- (c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

Compared with the approved project, the refined project would not be expected to create new or substantially more adverse significant impacts to land use and planning in relation to a conflict with any applicable habitat conservation plan or natural community conservation plan. The refined project would affect the same area analyzed in the certified EIR.¹¹ As with the approved project, the refined project area is located in an area designated for hospital use, not in an area proposed or adopted as part of a habitat conservation plan,¹² or a natural community conservation plan.¹³

⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁸ County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

⁹ County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles Land Use Policy Map*. Los Angeles, CA. Available at: http://planning.lacounty.gov/assets/upl/project/gp_web80-land-use-policy-map-5.pdf

¹⁰ County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

¹¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹² U.S. Fish and Wildlife Service, Carlsbad Office. Accessed 21 June 2011. “Habitat Conservation Plans.” Available at: http://www.fws.gov/carlsbad/HCPs/hcp_map%20area%20plans%200507.pdf

Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to a conflict with any adopted habitat conservation plan or natural community conservation plan.

¹³ California Department of Fish and Game. Accessed 21 June 2011. "Natural Community Conservation Planning." Available at: <http://www.dfg.ca.gov/habcon/nccp/images/region.gif>

3.11 MINERAL RESOURCES

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to mineral resources from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Mineral resources at the refined project site were evaluated with regard to California Geological Survey publications² and the adopted County of Los Angeles General Plan.³

The potential for the refined project to result in new or substantially more adverse significant impacts to mineral resources was evaluated in relation to two questions recommended for consideration by the State California Environmental Quality Act Guidelines:⁴

Would the refined project:

- (a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Compared with the approved project, the refined project would not be expected to create new or substantially more adverse significant impacts related to the loss of availability of a known mineral resource. The refined project would affect the same area analyzed in the certified EIR.⁵ Based on a review of California Geological Survey publications, there are no known mineral resources of statewide or regional importance located within the refined project site.⁶

According to *Mines and Minerals Producers Active in California (1997–1998)*, there are 25 active mines located within the County.⁷ The County contains active sand and gravel, dimension stone, clay, decorative rock, and tungsten producers. However, there are no mining districts located in or around the vicinity of the refined project site. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to the loss of availability of a known mineral resource.

- (b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Compared with the approved project, the refined project would not be expected to create new or substantially more adverse significant impacts to mineral resources in relation to the loss of

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² California Department of Conservation, California Geological Survey. [1966] Reprint released 13 March 2008. *Bulletin 189: Minerals of California*. Centennial Volume (1866–1966). Los Angeles, CA.

³ County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan, Conservation/Open Space Element*. Los Angeles, CA.

⁴ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁶ California Department of Conservation, California Geological Survey. [1966] Reprint released 13 March 2008. *Bulletin 189: Minerals of California*. Centennial Volume (1866–1966). Los Angeles, CA.

⁷ California Department of Conservation, California Geological Survey. Revised 1999. *Mines and Mineral Producers Active in California (1997–1998)*. Special Publication 103. Los Angeles, CA.

availability of a known mineral resource recovery site. The refined project would affect the same area analyzed in the certified EIR.⁸ Based on a review of California Geological Survey publications, the County of Los Angeles is abundant in sand and gravel deposits.⁹ However, according to the County General Plan, no known mineral resource recovery sites of local importance are located within the refined project site.¹⁰ The refined project site is designated as public and semipublic facilities according to the County General Plan.¹¹ Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to the loss of availability of a known locally important mineral resource recovery site.

⁸ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁹ California Geological Survey. [1966] Reprint released 13 March 2008. *Bulletin 189: Minerals of California*. Centennial Volume (1866–1966). Los Angeles, CA.

¹⁰ County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan, Conservation/Open Space Element*. Los Angeles, CA.

¹¹ County of Los Angeles Department of Regional Planning. November 1980. *County of Los Angeles General Plan, Conservation/Open Space Element*. Los Angeles, CA.

3.12 NOISE

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to noise from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Noise at the refined project site was evaluated with regard to the County of Los Angeles General Plan,² the Noise Control Ordinance of the County of Los Angeles (County),³ the City of Downey (City) Municipal Code,⁴ and the Downey Vision 2025 General Plan.⁵

The potential for the refined project to result in new or substantially more adverse significant impacts related to noise was evaluated in relation to six questions recommended for consideration by the State California Environmental Quality Act Guidelines:⁶

Would the refined project result in:

- (a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

The refined project would not create new or substantially more adverse significant impacts related to the exposure of people to, or generation of, noise levels in excess of established standards from those disclosed in the certified EIR.⁷

Construction

The noise impact analysis for the certified EIR determined that the approved project had the potential to create noise in excess of established standards during construction. The refined project would not be expected to generate additional higher noise levels than those evaluated in the certified EIR.⁸ During construction, the highest noise impacts are expected to be caused during excavation at 89 dBA (an "A"-weighted measurement for sound) at 50 feet from the refined project site. The nearest sensitive receptors to the refined project site are residential land uses. The allowed noise level at a residential land use is 75 dBA.^{9,10} The construction scenario would remain the same

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

³ County of Los Angeles. 1978. "Noise Control Ordinance of the County of Los Angeles." Ord. 11778, Section 2 (Art.1, Section 101), and Ord. 11773, Section 2 (Art. 1, Section 101). Available at: <http://ordlink.com/codes/lacounty/index.htm>

⁴ City of Downey. "Unnecessary Noises." Downey Municipal Code, Article IV, Chapter 6. Available at: <http://qcode.us/codes/downey/>

⁵ City of Downey Planning Division. Adopted 25 January 2005. "Chapter 6: Noise." In *Downey Vision 2025 General Plan*. Downey, CA.

⁶ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁸ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁹ County of Los Angeles. 1978. "Noise Control Ordinance of the County of Los Angeles." Ord. 11778, Section 2 (Art. 1, Section 101), and Ord. 11773, Section 2 (Art. 1, Section 101). Available at: <http://ordlink.com/codes/lacounty/index.htm>

with regard to the type of equipment utilized and the noise levels from that equipment. As with the approved project, the impacts from construction would be reduced to below the level of significance through the incorporation of mitigation measures as specified in the certified EIR.¹¹

Operational

Potential impacts resulting from operation of the refined project would not be expected to result in additional significant impacts as compared with the approved project. Potential building operation noise was calculated using typical heating, ventilation, and air conditioning (HVAC) equipment systems. Typical HVAC equipment noise levels are between 70 dBA to 100 dBA at 3 feet from the source without shielding and no intervening walls to provide attenuation.¹² Standard design features including shielding would reduce noise emissions to below the 55-dBA level. The nearest sensitive receptors (single-family residences) to the refined project site are 70 feet away, as measured from the edge of the Outpatient Facilities. The maximum permitted noise level at a residential location during operation is 45 dBA. Taking into consideration the distance from the noise source to the receptor, the noise levels at the nearest sensitive receptors would be less than 45 dBA. As analyzed in the certified EIR,¹³ the additional motor vehicle trips generated by the approved project would affect four locations: Imperial Highway (between Old River School Road and Rives Avenue), Old River School Road (between Imperial Highway and Quill Drive), Quill Drive (between Old River School Road and Rives Avenue), and Rives Avenue (between Quill Drive and Imperial Highway). The certified EIR found that noise levels would increase by less than 1.5 dBA at three of the four locations and would decrease by less than 1.0 dBA at the fourth location.¹⁴ The loudest approved project-generated traffic noise levels would be located at the Imperial Highway (between Old River School Road and Rives Avenue) location. The traffic noise generated by the approved project plus the existing noise levels would be 73.5 dBA, which would be a 0.8 dBA increase from the existing noise levels.¹⁵ A doubling of traffic volumes on a roadway would be expected to result in a 3-dBA increase in noise generated by traffic, which is the human threshold for perceiving a change in the ambient noise level. As documented in the certified EIR, the approved project would not result in a 3-dBA increase and, therefore, would be less than significant.¹⁶ The refined project would be expected to result in a less intense use of the site and require less vehicle trips than the approved project; therefore, the refined project would generate traffic noise levels lower than the traffic noise levels generated by the approved project. In addition, traffic noise levels would be reduced below the levels evaluated in the certified EIR due to the reduction in the number of workers resulting from the implementation of the refined project.

¹⁰ City of Downey. Accessed 8 July 2011. "Unnecessary Noises." Downey Municipal Code, Article IV, Chapter 6. Available at: <http://qcode.us/codes/downey/>

¹¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹² U.S. Environmental Protection Agency. 1971. *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances*, PB 206717. Washington, DC: Bolt, Beranek, and Newman.

¹³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁴ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

Therefore, as compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to exposure or generation of noise levels in excess of established standards with the incorporation of the mitigation measures specified in the certified EIR.¹⁷

- (b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

The refined project would not be expected to create a new or substantially more adverse significant impact from noise in relation to the generation of excessive groundborne vibration or groundborne noise from that disclosed in the certified EIR.¹⁸ For the purposes of this study, significance is based on a motion velocity of 0.01 inch per second over the range of 1 to 100 hertz during operation.¹⁹ There are no requirements for construction.

Vibration from building operations would be minimal and well below the criteria. The significance threshold shall be presumed to be a peak particle velocity (PPV) of 0.3 inch/second, the level at which buildings that are susceptible to vibration damage can begin to experience structural damage.²⁰ The refined project would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. As with the approved project, operation of the refined project would generate less than 0.3 inch/second PPV of vibration. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to generation of excessive groundborne vibration or groundborne noise.

- (c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

The refined project would not be expected to create new or substantially more adverse significant impacts from noise in relation to permanent increases in ambient noise levels from those disclosed in the certified EIR.²¹ The County Noise Ordinance does not define a substantial permanent increase to ambient noise levels. In general, one way of estimating a person's subjective reaction to a new noise is to compare the new noise with the existing noise environment to which the person has become adapted (i.e., the increase over the so-called "ambient" noise level). A 5-dBA increase is often considered a significant increase and, thus, a significant impact. Therefore, a 5-dBA increase in the noise levels would be considered substantial.

The highest operational impact would likely be at the residences across from Quill Drive. The lowest measured noise level in this area is 44 dBA. Therefore, operational noise level at the nearest sensitive receptor of 49 dBA or higher would be considered a significant impact. As stated above,

¹⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁸ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁹ County of Los Angeles. 1978. "Noise Control Ordinance of the County of Los Angeles." Ord. 11778, Section 2 (Art. 1, Section 101), and Ord. 11773, Section 2 (Art. 1, Section 101). Available at: <http://ordlink.com/codes/lacounty/index.htm>.

²⁰ Federal Transit Administration. May 2006. *Transit Noise and Vibration Impact Assessment*. Washington DC.

²¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

the operational noise level that would be generated at the nearest sensitive receptor is 40 dBA. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to permanent increases in ambient noise levels.

- (d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

The refined project would not create new or substantially more adverse significant impacts from noise in relation to temporary or periodic increases in ambient noise levels from those disclosed in the certified EIR.²² As stated above, a 5-dBA increase above the ambient levels is often considered a substantial increase and significant impact. The noise impact analysis for the certified EIR determined that the project had the potential to create a substantial temporary or periodic increase in ambient noise levels.²³ The construction noise threshold at the nearest sensitive receptor is 65 dBA. The construction scenario would remain the same as the approved project with regard to the type of equipment utilized and the noise levels from that equipment. The refined project would not be expected to result in additional impacts related to a substantial temporary or periodic increase in ambient noise levels in the refined project vicinity than those disclosed in the certified EIR.²⁴ Incorporation of the mitigation measures specified in the certified EIR and the methods to reduce impacts to noise included in the construction scenario of the refined project would reduce the impacts related to a substantial temporary or periodic increase in ambient noise levels in the refined project vicinity to below the level of significance. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to a substantial temporary or periodic increase in ambient noise levels in the refined project vicinity.

- (e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The refined project would not be expected to create new or substantially more adverse significant impacts from noise in relation to public airports from those disclosed in the certified EIR. The refined project would affect the same area analyzed in the certified EIR.²⁵ The nearest public airports are the Compton/Woodley Airport located approximately 5.3 miles to the southwest and the Long Beach Municipal Airport located approximately 7.1 miles to the south-southwest of the refined project site. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to public airports.

²² County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁴ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

- (f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

The refined project would not be expected to create new or substantially more adverse significant impacts from noise in relation to private airstrips from those disclosed in the certified EIR.²⁶ The refined project would affect the same area analyzed in the certified EIR. The nearest private airstrip to the refined project site, Shepherd Field in El Monte, California, is located approximately 7.8 miles northwest of the refined project site. Several airstrips used for hospitals and commercial buildings are located at distances greater than 10 miles from the refined project site.²⁷ Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to private airstrips.

²⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁷ Airport Master Records and Reports. Accessed 8 July 2011. Web Site. Available at: <http://gcr1.com/5010web/>

3.13 POPULATION AND HOUSING

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to population and housing from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Population and housing at the refined project site were evaluated with regard to state, regional, and local data and forecasts for population and housing and the proximity of the refined project site to existing and planned utility infrastructure.

The potential for the refined project to result in new or substantially more adverse significant impacts to population and housing was evaluated in relation to three questions recommended for consideration by the State California Environmental Quality Act (CEQA) Guidelines.²

Would the refined project:

- (a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The refined project would not be expected to create new or substantially more adverse significant impacts to population and housing in relation to inducing substantial direct or indirect population growth from those disclosed in the certified EIR.³ Pursuant to State CEQA Guidelines Section 15064.7, typical established local thresholds of significance for housing and population growth include effects that would induce substantial growth or concentration of a population beyond County of Los Angeles (County) projections; alter the location, distribution, density, or growth rate of the population beyond that projected in the Housing Element of the County General Plan; result in a substantial increase in demand for additional housing; or create a development that significantly reduces the ability of the County to meet housing objectives set forth in the Housing Element of the County General Plan.⁴

The refined project site, located in the County of Los Angeles and in the City of Downey (City), would provide employment consistent with adopted County and City land use goals, plans, and policies. The north campus is a dense, urban community supported by developed road and utility infrastructure. The refined project would exceed 1,224 employees at any one time, as allowed by the certified EIR. The refined project may include Veteran Housing. However, the Veteran Housing would not require additional demolition or construction beyond that described in the certified EIR. The Veteran Housing would be up to approximately 175,365 square feet and would include up to 200 beds for veterans age 62 or older (or younger if disabled). The refined project would not be expected to induce substantial population growth in the area, as the housing would be only for veterans and would not include school-age population. Therefore, the refined project would not be expected to induce any substantial population growth in the area.

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁴ County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

According to the most recently available U.S. Census data, the City's population was 111,772 as of 2010.⁵ This represents a 4.1-percent increase from the 2000 population (107,323), and a 22-percent increase from the 1990 population.⁸ According to the Southern California Association of Governments (SCAG), the City of Downey and the surrounding Gateway Cities subregion will have a lower rate of population growth over the next 10-year and 25-year periods than either the SCAG region or Los Angeles County. Projected population growth for the Gateway Cities subregion is approximately 3.9 percent for the period 2010 to 2020, as compared to 9.3 percent for the SCAG region and 5.6 percent for Los Angeles County for the same period. Similarly, the Gateway Cities subregion has a lower projected population growth at 12.2 percent for the period 2010 to 2035, as compared to 22.2 percent and 14.2 percent for the SCAG region and Los Angeles County, respectively.¹⁰

The refined project would not be expected to induce substantial growth (up to 1,224 employees and potential Veteran Housing with up to 200 beds) or concentration of population beyond County and City regional projections. The refined project would not be expected to require expansion of existing roadways or the construction of new homes. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to inducing substantial direct or indirect population growth.

- (b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

The refined project would not be expected to create new or substantially more adverse significant impacts to population and housing in relation to the displacement of substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere, from those disclosed in the certified EIR.¹² The refined project does not include the displacement of any type of permanent or temporary residence. The refined project may include the construction of new Veteran Housing units, but the refined project would not be expected to alter the location, distribution, density, or growth of the human population of an area substantially beyond that projected in the Housing Element of the Downey Vision 2025 General Plan.¹³ Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to the displacement of substantial amounts of existing housing.

- (c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

The refined project would not be expected to create new or substantially more adverse significant impacts to population and housing in relation to the displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere, from those disclosed in

⁵ United States Census Bureau, 2010 Census. Available at: www.census.gov

⁸ City of Downey Planning Department. November 2009. *Downey Housing Element Update*. Downey, CA. Available at: http://www.downeyca.org/gov/cd/planning/general_plan_n_map/default.asp

¹⁰ Gateway Cities Council of Governments. June 21, 2011. *Subregional Sustainable Communities Strategy Final Report*. Available at http://gatewaycog.org/publications/FR1_GCCOG_SCS_SectionsFinal%5B5%5D.pdf

¹² County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053.. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹³ City of Downey Planning Department. Adopted December 2001. *City of Downey 2000–2005 Housing Element*. Downey, CA. Available at: http://www.downeyca.org/_blobcache/0000/0003/3491.pdf

the certified EIR.¹⁴ Currently, Rancho Los Amigos functions as a medical facility, and operations would continue as such. The hospital is currently licensed to serve 396 inpatient beds but currently has 176 active beds on average and receives approximately 50,000 outpatient visits per year. The refined project aims to reduce the licensed inpatient bed count from 396 to approximately 200, while maintaining the current number of outpatient visitors per year. The refined project may add up to 200 beds with the potential inclusion of Veteran Housing for elderly or disabled veterans, but the total number of beds for both patients and veterans (up to 400) would be less than the total number of beds analyzed in the approved project (600). The refined project would not displace any people, necessitating the construction of replacement housing elsewhere. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to the displacement of substantial numbers of people.

¹⁴ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

3.14 PUBLIC SERVICES

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to public services than those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Public services at the refined project site were evaluated based on a review of the County of Los Angeles General Plan,² the Downey Vision 2025 General Plan,³ the City of Downey (City) Web site,⁴ and telephone conversations with the City Police and Fire Departments.^{5,6}

The potential for the refined project to result in new or substantially more adverse significant impacts to public services was evaluated in relation to one question recommended for consideration by the State California Environmental Quality Act (CEQA) Guidelines:⁷

(a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

i) Fire protection?

The refined project would not be expected to create new or substantially more adverse significant impacts to public services in relation to fire protection from that disclosed in the certified EIR. The certified EIR adequately mitigates all impacts to below the level of significance. The refined project would not be expected to cause any new or substantially more adverse significant impacts beyond the impacts already considered in the certified EIR. Due to an increase in the level of fire protection services in the City since the EIR was certified in 1992, the reduced expansion of the refined project site, and the incorporation of mitigation measures as specified in the certified EIR, the impacts of the refined project with regard to fire protection would be expected to be below the level of significance.⁸ The refined project consists of facilities to serve the health care services of the County of Los Angeles (County). The entire Rancho Los Amigos campus is located in the City and is served by the Downey Fire Department (DFD), which maintains four fire stations throughout the City: Fire Station No. 1, Fire Station No. 2, Fire Station No. 3, and Fire Station No. 4 (Table 3.14-1, *Fire Stations in the Refined Project Vicinity*).

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

³ City of Downey Planning Department. Adopted 25 January 2005. *Downey Vision 2025 General Plan*. Available at: http://www.downeyca.org/gov/cd/planning/general_plan_n_map/default.asp

⁴ City of Downey. Web site. Accessed on: 8 July 2011. Available at: <http://www.downeyca.org/>

⁵ Garza, Stephen, City of Downey Police Department. 21 July 2011. Email to Leanna Guillermo, Sapphos Environmental, Inc. Pasadena, CA.

⁶ Seely, Chuck, City of Downey Fire Department. 11 July 2011. Email to Leanna Guillermo, Sapphos Environmental, Inc., Pasadena, CA.

⁷ *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

⁸ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

**TABLE 3.14-1
FIRE STATIONS IN THE REFINED PROJECT VICINITY**

City Station	Location	Personnel	Resources	Distance from Site (miles)
Station 1	12222 Paramount Boulevard Downey, CA 90242	10	One triple combination pumper with crew of three (captain, engineer, and firefighter), one 100-foot aerial ladder truck with crew of four, one battalion chief, and one paramedic rescue squad with crew of two	1.4
Station 2	9556 Imperial Highway Downey, CA 90242	3	One triple combination pumper with crew of three	2.6
Station 3	9900 Paramount Boulevard Downey, CA 90240	5	One triple combination pumper with crew of three and 1basic transport ambulance with crew of two	3.5
Station 4	9349 Florence Boulevard Downey, CA 90240	5	One triple combination pumper with crew of three and one paramedic rescue squad with crew of two	4.7

The DFD has also added a “decontamination trailer” with equipment for decontaminating persons and controlling hazardous materials spills/leaks and a “Heavy Level” Urban Search and Rescue (USAR) truck with equipment for shoring, trench rescue, and other specialized rescue scenarios. The response time for Station 61 to the refined project is currently approximately 5 minutes.⁹ All four fire stations provide service to the refined project site, and any County fire station may respond to the refined project site according to need and availability, and would draw units from several stations. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to fire protection.

ii) Police protection?

The refined project would not be expected to create new or substantially more adverse significant impacts to public services in relation to police protection from that disclosed in the certified EIR. The certified EIR adequately mitigates all impacts to below the level of significance. The refined project would not be expected to cause any or substantially more adverse significant impacts beyond those already considered in the certified EIR.¹⁰

Police protection services in the refined project area are provided by the Downey Police Department (DPD) located at 10911 Brookshire Avenue, approximately 2.5 miles from the refined project site. The estimated response time for any location within the City is within 5 minutes for emergency calls and within 9 minutes for non-emergency calls. The DPD currently maintains a ratio of 1.06 sworn officers per 1,000 residents, which is currently sufficient to provide adequate police protection for the community.¹¹ The refined project would not be expected to induce substantial population growth and would not be expected to require additional DPD personnel or

⁹ Seely, Chuck, Downey Fire Department. 11 July 2011. Email to Leanna Guillermo, Sapphos Environmental, Inc., Pasadena, CA.

¹⁰ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹¹ Garza, Stephen, Downey Police Department. 21 July 2011. Letter to Leanna Guillermo, Sapphos Environmental, Inc. Pasadena, CA.

construction of new DPD facilities beyond those impacts documented in the certified EIR.¹² Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to police protection.

iii) Schools?

The refined project would not be expected to create new or substantially more adverse significant impacts to public services in relation to schools from that disclosed in the certified EIR.¹³ The Downey Unified School District (DUSD) serves the City and operates 13 elementary schools, 4 middle schools, and 3 high schools. In addition, DUSD operates a school at Rancho Los Amigos in the 900 Building of the north campus to serve handicapped children in the area. The refined project would not be expected to induce substantial population growth beyond the growth anticipated in the certified EIR.¹⁴ Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to schools.

iv) Parks?

The refined project would not be expected to create new or substantially more adverse significant impacts to public services in relation to parks from that disclosed in the certified EIR.¹⁵ The number of parks in the City has substantially increased since the 1992 EIR was certified and, consequently, the potential for impact has decreased. The parks and recreational facilities located within an approximate 1-mile radius of the refined project site include Apollo Park, Hollydale Park, Brookshire Children's Park, All American Park, and the Los Amigos Golf Course. The refined project would not be expected to induce substantial population growth and would not be expected to increase the level of demand on existing park facilities in the City. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to parks.

v) Other public facilities?

The refined project would not be expected to create new or substantially more adverse significant impacts to public services in relation to other public facilities from that disclosed in the certified EIR.¹⁶ The refined project area is adequately served by public facilities, including a United States Post Office located at 8051 East Imperial Highway, approximately 0.4 mile to the east, and the Downey City Library located at 11121 Brookshire Avenue, approximately 1 mile to the northeast. The certified EIR adequately documented and mitigated impacts to other public facilities.¹⁷ The

¹² County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁴ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA

refined project would be expected to decrease the number of users of public services and other facilities, including libraries, energy, natural gas, communications systems, water service, sanitary sewers, and solid and waste processing facilities, when compared to the approved project described in the certified EIR.¹⁸ Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to other public facilities.

¹⁸ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

3.15 RECREATION

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to recreation from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Recreation at the refined project site was evaluated with regard to expert opinion, technical studies, and other substantial evidence. The conclusions rely primarily on information contained in the County of Los Angeles General Plan,² Downey Vision 2025 General Plan (Downey Vision 2025),³ expert opinions, and the consideration of the potential for growth-inducing impacts evaluated in Section 3.13, *Population and Housing*, of this Addendum No. 1 to the EIR.

The potential for the refined project to result in new or substantially more adverse significant impacts to recreation was evaluated in relation to two questions recommended for consideration by the State California Environmental Quality Act (CEQA) Guidelines.⁴

Would the refined project:

- (a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction, operation, and maintenance of the refined project would not be expected to create new or substantially more adverse significant impacts related to an increase in the use of existing neighborhood and regional parks or other recreational facilities from that disclosed in the certified EIR.⁵ The number of parks in the City of Downey (City) has substantially increased since the 1992 EIR was certified and the potential for impacts has consequently decreased. As discussed in Section 3.13, *Population and Housing*, the growth levels associated with the refined project are consistent with Downey Vision 2025 and Southern California Association of Governments projections. The refined project may include up to 175,365 square feet of Veteran Housing, with up to 200 beds. However, the Veteran Housing would not induce substantial population growth in the area as the housing would be for veterans of age 62 or older (or younger if disabled) only, and would not include school-age population. The refined project would not be expected to induce substantial growth or concentration of population beyond the City's regional projections. Therefore, no individual park or recreation facilities would be expected to experience physical deterioration as a result of implementation of the refined project.

Apollo Park is a recreational facility adjacent to the refined project site. Hollydale Park, All American Park, Brookshire Children's Park, and Los Amigos Golf Course are recreational facilities that are approximately within a 1-mile radius of the refined project site. These parks and facilities serve the recreational needs of the surrounding community. According to the Gateway Final

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Los Angeles, CA. Contact: 320 West Temple Street, Room 1348, Los Angeles, CA 90012.

³ City of Downey Planning Department. Adopted 25 January 2005. Accessed 8 July 2011. *Downey Vision 2025 General Plan*. Available at: http://www.downeyca.org/gov/cd/planning/general_plan_n_map/default.asp

⁴ *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

Municipal Service Review (MSR), the City of Downey has nearly 400 acres of park space, with 3.5 acres of park and open space per every 1,000 residents, which is above the average within the MSR area (the area southeast of the City of Los Angeles that includes 26 cities and 10 unincorporated communities).⁶

The refined project would not be expected to result in a significant increase in the number of people, residents, or visitors that would avail themselves of existing park facilities. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to increased use of existing neighborhood and regional parks or other recreational facilities that would contribute to, or accelerate, the physical deterioration of existing facilities.

- (b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The refined project would not be expected to create new or substantially more adverse significant impacts related to the construction and expansion of recreational facilities that might have an adverse physical effect on the environment from that disclosed in the certified EIR.⁷ As with the approved project, the refined project would not include recreational facilities or require the construction or expansion of recreational facilities in the refined project area. Furthermore, the refined project would be expected to provide the County with an improved medical care facility that directly contributes to the health and wellness of County residents. As discussed in Section 3.13, *Population and Housing*, the refined project would not be expected to result in substantial new population growth that would increase the need for construction or expansion of recreation facilities. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to the construction of recreation facilities.

⁶ Local Agency Formation Commission for Los Angeles County. 30 November 2005. *Gateway Final Municipal Service Review*. Prepared by Burr Consulting.

⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

3.16 TRANSPORTATION AND TRAFFIC

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to transportation and traffic from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Transportation and traffic at the refined project site were evaluated with regard to the Circulation Element of Downey Vision 2025 General Plan (Downey Vision 2025),² the Congestion Management Plan for the County of Los Angeles (County),³ the County General Plan,⁴ and the Traffic Impact Analysis Report Guidelines.⁶

The potential for the refined project to result in new or substantially more adverse significant impacts related to transportation and traffic was evaluated in relation to six questions recommended for consideration by the State California Environmental Quality Act Guidelines:⁸

Would the refined project:

- (a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

The refined project would not be expected to result in new or substantially more adverse significant impacts to transportation and traffic in relation to a conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system from those disclosed in the certified EIR.⁹ Trip generation estimates were prepared for the approved project at Rancho Los Amigos (Table 3.16-1, *Trip Generation Rates and Estimates*) and were then compared with estimates for the future refined project facilities. The proposed refinements to the approved project would entail a reduction of hospital beds by approximately 50 percent (from 396 currently licensed beds to approximately 200 beds), potential Veteran Housing, and a reduction in the overall square footage of development on site. These changes would be expected to result in approximately 1,783 fewer daily vehicle trips to and from the refined project site. Because the refined project would be expected to result in a less intense use of the site and a reduction in trip generation, no further traffic analysis of project build-out was necessary. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to conflict with an applicable

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² City of Downey Planning Department. January 2005. *Downey Vision 2025 General Plan, Circulation Element*. Downey, CA.

³ County of Los Angeles Metropolitan Transportation Authority. 2004. *2004 Congestion Management Program for Los Angeles County*. Los Angeles, CA.

⁴ County of Los Angeles Department of Regional Planning. 1980. *County of Los Angeles General Plan*. Los Angeles, CA.

⁶ County of Los Angeles Department of Public Works. 1 January 1997. *Traffic Impact Analysis Report Guidelines*. Alhambra, CA.

⁸ *California Code of Regulations*, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

⁹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system.

**TABLE 3.16-1
TRIP GENERATION RATES AND ESTIMATES**

Trip Generation Rates	
Trips per occupied hospital bed (ITE Code 610)	11.81
Trips per bed assisted living (Veteran Housing) (ITE Code 254)	2.66
Trip Generation Estimates	
Existing conditions (396 hospital beds)	4,677
With refined project (approx. 200 beds)	2,362
With refined project (approx. 200 beds within potential Veteran Housing)	532
Net change in trips relative to approved project	-1,783 (-38%)

SOURCE: Institute of Transportation Engineers. 2003. *Trip Generation*. 8th Edition. Washington, DC.

- (b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

The refined project would not be expected to create new or substantially more adverse significant impacts to transportation and traffic in relation to conflict with an applicable congestion management program from those disclosed in the certified EIR.¹¹ Trip generation estimates were prepared for the facilities approved in the certified EIR and were then compared with estimates for the proposed hospital facilities in the refined project (Table 3.16-1). The refined project would entail a reduction of hospital beds by approximately 50 percent (from 396 currently licensed beds to approximately 200 beds), potential Veteran Housing, and a reduction in the overall square footage of development on site. These changes would result in approximately 1,783 fewer daily vehicle trips to and from the refined project site. Because the refined project would be expected to result in a less intense use of the site and a reduction in trip generation, no further traffic analysis of project build-out was necessary. The refined project would not be expected to impact the existing levels of service and would be expected to result in an improvement of the existing traffic conditions in the vicinity. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to transportation and traffic related to conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

- (c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The refined project would not be expected to create new or substantially more adverse significant impacts to transportation and traffic in relation to a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks from that disclosed in the certified EIR.¹² As with the approved project, the refined project site is not in close

¹¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹² County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

proximity to any airports. The refined project site is located 5.3 miles northeast of the Compton/Woodley Airport and approximately 7.1 miles north-northeast of the Long Beach Municipal Airport. The nearest private airstrip to the refined project site, Shepherd Field in El Monte, California, is located approximately 7.8 miles northwest of the refined project site. Therefore, as with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to transportation and traffic related to a change in air traffic patterns, which would result in substantial safety risks.

- (d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The refined project would not be expected to create new or substantially more adverse significant impacts to transportation and traffic in relation to substantially increasing hazards due to a design feature or incompatible uses from those disclosed in the certified EIR.¹³ The refined project would be expected to only result in minor modifications to the internal circulation system of the north campus. The result of any modifications would be aimed at improving overall traffic flow and circulation patterns in the immediate vicinity of the refined project site. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to transportation and traffic related to substantially increasing hazards due to a design feature.

- (e) Result in inadequate emergency access?

The refined project would not be expected to create new or substantially more adverse significant impacts to transportation and traffic in relation to inadequate emergency access from those disclosed in the certified EIR.¹⁴ The existing emergency access system would be expected to be adequate during construction and operation of the refined project. The refined project does not involve any activity that would be expected to create a deficiency in the emergency access system. All construction and demolition activity would be organized to avoid interruptions in any emergency services undertaken by Rancho Los Amigos, as well as any access/egress paths to and from its facilities. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to transportation and traffic related to inadequate emergency access.

- (f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The refined project would not be expected to create new or substantially more adverse significant impacts to transportation and traffic in relation to conflicting with adopted policies, plans, or programs supporting alternative transportation from those disclosed in the certified EIR.¹⁵ The design features of the refined project would support rather than conflict with the use of alternative modes of transportation. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to a conflict with adopted policies, plans, or programs supporting alternative transportation.

¹³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁴ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report*. SCH No. 91071053. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

3.17 UTILITIES AND SERVICE SYSTEMS

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to utilities and service systems than those disclosed in project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Utilities and service systems at the refined project site were evaluated with regard to the Safety Element of the County of Los Angeles General Plan² and the California Regional Water Quality Control Board (RWQCB) Basin Plan for the Los Angeles Region.³

The potential for the refined project to result in new or substantially more adverse significant impacts to utilities and service systems was evaluated in relation to seven questions recommended for consideration by the State California Environmental Quality Act (CEQA) Guidelines:⁴

Would the refined project:

- (a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

The refined project would not be expected to create new or substantially more adverse significant impacts to utilities and service systems in relation to exceedance of wastewater treatment requirements of the Los Angeles RWQCB from that disclosed in the certified EIR.⁵ Wastewater generated by the refined project's modified components would continue to be treated at the Whittier Narrows Water Reclamation Plant (WRP), located at 301 North Rosemead Boulevard in El Monte, California, approximately 13 miles northeast of the refined project site. The Whittier Narrows WRP has the capacity to treat up to 15 million gallons of primary, secondary, and tertiary wastewater per day.⁶ As compared with the approved project, the refined project would be expected to result in less generation of wastewater than previously analyzed in the certified EIR due to an overall reduction in the square footage for the refined project.⁷ Wastewater would flow into the existing system. The refined project would not entail the development of new sewer lines.

The County of Los Angeles (County) and the City of Downey (City) both have adopted a Storm Water Management Program requiring new development to meet National Pollutant Discharge Elimination System (NPDES) requirements through Best Management Practices (BMPs). Construction of the Jacqueline Perry Institute (JPI) Building Expansion, construction of the

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² County of Los Angeles Department of Regional Planning. 1990. *County of Los Angeles General Plan, Safety Element*. Los Angeles, CA.

³ California Regional Water Quality Control Board, Los Angeles Region. February 1995. *Water Quality Control Plan: Los Angeles Region*. Monterey Park, CA.

⁴ *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000-15387, Appendix G.

⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁶ Sanitation Districts of Los Angeles County. Accessed on: 8 July 2011. Web Site. "Wastewater Management System." *Who are the Sanitation Districts?* Available at: http://www.lacsd.org/about/wastewater_facilities/joint_outfall_system_water_reclamation_plants/whittier_narrows.asp

⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

Outpatient Facilities, potential construction of the Veteran Housing, and demolition of vacated buildings would be required to be completed in accordance with the County's NPDES permit (CAS614001, Order No. 1-182), including incorporation of BMPs during the construction, operation, and maintenance of the consolidated program in the north campus. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to utilities and service systems related to exceedance of wastewater treatment requirements.

- (b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The refined project would not be expected to create new or substantially more adverse significant impacts requiring or resulting in the construction of new water or wastewater treatment facilities from that disclosed in the certified EIR. As indicated in Section III.I.9, Water, of the certified EIR, Rancho Los Amigos and other nearby uses are served by the Rancho Water System, which is owned and operated by the County, and the Metropolitan Water District of Southern California (MWD).⁸ The EIR analysis was based on fiscal year 1989/1990, where the well draw by the Rancho Water System was 514.0 acre-feet and 551.3 acre-feet of MWD water was used. Cumulative projects, including the approved project, were estimated to create a net demand of 415,000 gallons of water per day or 152 million gallons per year. Compared with the approved project, the refined project would reduce the total area of buildings on the north campus from approximately 1,365,029 square feet⁹ to approximately 1,162,270 square feet, which is approximately 202,759 square feet less in total building space than what has been approved in the certified EIR.¹⁰ As with the approved project, the refined project would continue to require implementation of the specified mitigation measures for water provisions and infrastructure upgrades, prior to occupancy of the JPI Building Expansion and the Outpatient Facilities. The refined project would be expected to result in less than significant impacts to utilities and service systems in relation to wastewater treatment plants requiring expansion as a result of the refined project. Water service for the north campus is provided by the Rancho Water System, which is currently owned and operated by the County. The well water is the main source of water at the north campus, with MWD service used for backup only. Due to the reduction in the overall square footage in the refined project as compared to the approved project, the refined project would be expected to generate less wastewater than the approved project. In addition, the wastewater that would be generated by the refined project would be treated at WRP, which has the capacity to treat up to 15 million gallons of primary, secondary, and tertiary wastewater. WRP currently has the capacity to accommodate the additional wastewater generated by the refined project. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to utilities and service systems related to expansion or construction of new water or wastewater treatment facilities.

⁸ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁰ The refined project assumes approximately 353,365 square feet of new construction (JPI extension, outpatient facilities, and potential veteran housing); 412,808 square feet of renovation (JPI Building, Harriman Building, and Support Services Annex Kitchen); and 396,097 square feet of retained buildings (Parking Structure and Safety Police Office). Therefore, the refined project accounts for approximately 1,162,270 square feet of building space in total.

- (c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The refined project would not be expected to create new or substantially more adverse significant impacts to utilities and service systems related to construction of new storm water drainage facilities or expansion of existing facilities from that disclosed in the certified EIR.¹¹

As discussed previously in Section 3.9, *Hydrology and Water Quality*, the refined project would not be expected to result in an overall net change in the total impervious surface area approved in the certified EIR as the refined project would include demolition of extra buildings and retention of the Harriman Building that was originally approved for demolition.¹² Therefore, no contribution to an exceedance in runoff would be expected to result with the overall change in building coverage and paved areas for the refined project. Section III.F, *Geology/Soils/Seismicity*, of the certified EIR determined that adequate storm water capacity exists south and west of the project site to carry the storm water runoff.¹³ The intersection of Quill Drive and Rives Avenue (northeast of the refined project site) has experienced flooding even during periods of moderate rainfall. As a result of flood improvements being made at this intersection and within the vicinity of refined project site, this area is currently capable of providing a 100-year or greater level of flood protection as required by the Federal Emergency Management Agency.¹⁴ As with the approved project, implementation of the specified mitigation measures requiring existing storm drain facilities to be upgraded to adequately transport storm water runoff to existing County storm drain facilities on Imperial Highway and Old River School Road would be required. Compared with the approved project, the refined project would not be expected to create new or substantially more adverse significant impacts to utilities and service systems related to construction of new storm water drainage facilities or expansion of existing facilities.

- (d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

The refined project would not be expected to create new or substantially more adverse significant impacts from that disclosed in the certified EIR related to groundwater supplies or groundwater recharge during the construction and operation of the refined project.¹⁵ The refined project includes the reduction in size of the JPI Building Expansion and the demolition of additional buildings not previously analyzed in the certified EIR.¹⁶ As indicated in Section III.I.9, *Water*, of the certified EIR, Rancho Los Amigos and other nearby uses are served by the Rancho Water System

¹¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹² County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁴ National Flood Insurance Program. 26 September 2008. Flood Insurance Rate Map, City of Downey, California, Los Angeles County, Community Panel Number 06037C1820F. Contact: Federal Emergency Management Agency, Los Angeles, CA.

¹⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

and MWD.¹⁷ The EIR analysis was based on fiscal year 1989/1990 where the well draw by the Rancho Water System was 514.0 acre-feet and 551.3 acre-feet of MWD water was used. Cumulative projects, including the approved project, were estimated to create a net demand of 415,000 gallons of water per day, or 152 million gallons per year. Compared with the approved project, the refined project would reduce the total area of buildings on the north campus from approximately 1,365,029 square feet¹⁸ to approximately 1,162,270 square feet.¹⁹ As with the approved project, the refined project would continue to require implementation of the specified mitigation measures for water provisions and infrastructure upgrades prior to occupancy of the JPI Building Expansion and Outpatient Facilities. Therefore, the additional demolition and proposed renovations would not be expected to deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. No new or expanded entitlements would be required to provide sufficient water as a result of the proposed refinements to the approved project. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to sufficient water supplies.

- (e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The refined project would not be expected to result in new or substantially more adverse significant impacts related to the wastewater treatment provider's capacity to serve the project within existing commitments from that disclosed in the certified EIR.²⁰ The refined project would require additional demolition but not additional construction. The quality of storm water runoff is regulated under the NPDES storm water permit (CAS614001, Order No. 1-182) issued to the County by the Los Angeles RWQCB, which provides a mechanism for establishing appropriate controls and monitoring the discharge of pollutants to the storm water runoff system. The County requires all development projects within its jurisdiction on sites of 1 acre or larger to comply with the NPDES requirements for construction and operations as appropriate. As approved in 1992, the project would have required grading on most of the north campus (see Figures 2 to 15 in the Draft EIR²¹). The refined project would affect most of the 49-acre portion of the north campus of Rancho Los Amigos and would therefore be subject to compliance with the County's NPDES permit.

Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts related to the wastewater treatment provider's capacity to serve the project within existing commitments.

¹⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁸ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

¹⁹ The refined project assumes approximately 353,365 square feet of new construction (JPI Building Extension, Outpatient Facilities, and potential Veteran Housing); 412,808 square feet of renovation (JPI Building, Support Services Annex Kitchen, Harriman Building, and Central Utility Plant); and 396,097 square feet of retained buildings (Safety Police Building and Parking Structure). Therefore, the refined project accounts for approximately 1,162,270 square feet of building space in total.

²⁰ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

- (f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

When compared to the approved project disclosed in the certified EIR,²² the refined project would not be expected to create new or substantially more adverse significant impacts to utilities and service systems related to being served by a landfill with sufficient permitted capacity. The refined project would include the demolition of additional structures not previously analyzed in the certified EIR, resulting in generation of solid waste from building debris.²⁴ As specified in the certified EIR, the County shall divert at least 50 percent of the construction solid waste to ensure compliance with applicable federal, state, and local statutes related to solid waste and reduce direct and cumulative impacts from construction to below the level of significance.²⁵ Prior to advertising for construction bids for the JPI Building Expansion, the County would ensure that the plans and specifications include the requirement for the construction contractor to comply with the Solid Waste Management Act of 1989. To ensure conformance with the Solid Waste Management Act of 1989, the County would require the construction contractor to manage the solid waste generated during construction of the project by diverting at least 50 percent of the waste from disposal in landfills, particularly Class III landfills, through source reduction, reuse, and recycling of construction and demolition debris. The construction contractor would be required to submit a construction solid waste management plan to the County for approval prior to initiation of demolition activities for the JPI Building Expansion. The construction contractor would be required to demonstrate compliance with the solid waste management plan through the submission of monthly reports during demolition activities that estimate total solid waste generated and diversion of 50 percent of solid waste. Calsan, Inc. is the solid waste collector for the City. Solid waste is collected and hauled to the Downey Area Recycling and Transfer (DART) Facility in the City and to the Puente Hills Landfill located at 13130 Crossroads Parkway in the City of Industry, approximately 15 miles northeast of the refined project site. As of 2006, the remaining solid waste capacity of the Puente Hills Landfill was approximately 35,200,000 cubic yards and is not expected to reach full capacity until the year 2013.²⁶ Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to utilities and service systems related to a landfill with sufficient space to accommodate the refined project's waste disposal needs.

- (g) Comply with federal, state, and local statutes and regulations related to solid waste?

The refined project would not be expected to create new or substantially more adverse significant impacts to utilities and service systems in relation to compliance with federal, state, and local statutes and regulations related to solid waste from that disclosed in the certified EIR.²⁷ The refined project would be expected to generate additional solid waste during construction from demolition

²² County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁴ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁵ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁶ California Integrated Waste Management Board. Accessed 8 July 2011. Web Site. Available at: <http://www.calrecycle.ca.gov/profiles/Facility/Landfill/LFProfile1.asp?COID=19&FACID=19-AA-0053>

²⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

of additional existing structures not previously analyzed in the certified EIR.²⁸ The refined project would be in compliance with the California Integrated Waste Management Act of 1989 and the California Solid Waste Reuse and Recycling Access Act of 1991 as amended. The refined project would comply with federal, state, and local statutes and regulations to reduce the amount of solid waste through implementation of the mitigation measures specified in the certified EIR.²⁹ Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to utilities and service systems related to compliance with federal, state, and local statutes.

²⁸ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

²⁹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

3.18 MANDATORY FINDINGS OF SIGNIFICANCE

This analysis is undertaken to determine if the proposed refinements to the North Campus Site Consolidation (refined project) would result in new or substantially more adverse significant impacts in relation to mandatory findings of significance from those disclosed in the project described in the certified 1992 Rancho Los Amigos Medical Center Environmental Impact Report (EIR) (approved project).¹ Mandatory findings of significance of the refined project were evaluated with regard to Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines.²

The State CEQA Guidelines recommend the consideration of three questions when addressing the potential for significant impact to mandatory findings of significance:

Would the refined project:

- (a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The refined project would not be expected to result in significant impacts with regards to the potential to degrade the environment through the reduction of endangered plant or animal species from those disclosed in the certified EIR.³ The north campus is developed for institutional land uses; there are no riparian habitats or other sensitive natural communities present within the north campus. The north campus does not support aquatic or riparian habitats; there is no potential for migratory fish to be present. As stated in Section 3.4, *Biological Resources*, the developed property does provide suitable resting habitat for migratory birds or bats, and would not impede their movement. The refined project site is in the same location as the approved project, which does not interfere with wildlife corridors, species movement, or nursery sites. Therefore, the refined project would not be expected to have the potential to degrade the quality of the environment in relation to a substantial reduction in the habitat of a fish or wildlife species, a drop below self-sustaining levels of a fish or wildlife population, elimination of a plant or animal community, or a reduction in the number or a restriction of the range of a rare or endangered plant or animal.

The refined project would be expected to result in less than significant impacts to mandatory findings of significance in relation to the potential to degrade the quality of the environment by elimination of important examples of California history. Potential impacts to cultural resources, including historical resources, were investigated in the 1991 Initial Study. The Initial Study for the certified EIR concluded that, although the Harriman Building (Building 400, LACO No. 1180) was "of interest to the community," primary construction of the north campus occurred in the 1960s

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

² *California Code of Regulations*. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

³ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

and 1970s, and none of the buildings on the refined project site was of historical significance.⁴ Therefore, the demolition of several buildings proposed as part of the approved project, including the Harriman Building, was not determined to be an adverse impact to historical resources. The 1992 approved project incorporated reuse of the Harriman Building facade as a symbolic gateway to the north campus.

However, the refined project would rehabilitate the Harriman Building in a manner that is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.⁵ In addition, none of the buildings currently proposed for demolition is considered to be a historic resource as defined by CEQA. Therefore, compared with the approved project, the refined project would not be expected to result in new or substantially more adverse significant impacts to cultural resources related to a substantial adverse change in the significance of a historical resource.

- (b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future project)?

Cumulative impacts are an evaluation of a project's potential impact combined with impacts resulting from other projects. The refined project would consolidate structures with a more efficient strategy for providing critical health care services and is an update of the approved project described in the certified 1992 EIR.⁶ After an evaluation of the 17 environmental resources required by CEQA, it was determined that 16 out of the 17 resources would result in less than significant impact when compared to those that were disclosed in the certified EIR.⁷ The impacts of greenhouse gas emissions on global climate change were not yet recognized by the State of California at the time of the certification of the EIR in 1992 and, therefore, were not included in the analysis of impacts in the 1992 EIR. Amendments to the State CEQA Guidelines requiring analysis of greenhouse gas emissions became effective on March 18, 2010. Therefore, this Addendum No. 1 to the EIR provides an assessment of the potential impacts of the refined project on greenhouse gas emissions. Potentially significant impacts were evaluated in Section 3.7, *Greenhouse Gas Emissions*. However, after the implementation of mitigation measures, the refined project would result in less than significant impacts. As indicated in Sections 3.1 through 3.17, the refined project would have a less than significant individual impacts, and as with the evaluation of the approved project, the refined project would not result in cumulatively considerable impacts.

- (c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The refined project would be expected to result in less than significant impacts with regard to environmental effects that would cause substantial adverse effects on human beings, either directly

⁴ County of Los Angeles Internal Services Department. December 1991. *Rancho Los Amigos Medical Center Draft Environmental Impact Report*. SCH No. 91071053, pp. A2–A16. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁵ Weeks, Kay D., and Anne E. Grimmer. 1995. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstruction Historic Buildings*. Washington, DC: U.S. Department of the Interior, National Park Service.

⁶ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

⁷ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

or indirectly, from those disclosed in the certified EIR. Impacts related to the construction of the refined project would be temporary; the implementation of the project features stated in Section 2.0, *Project Description*; the mitigation measures stated in Section 3.7, *Greenhouse Gas Emissions*; and the mitigation measures stated in the certified EIR would reduce these impacts.

The refined project would not be expected to result in significant impacts to agricultural resources, aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, traffic and transportation, and/or utilities and service systems, from those disclosed in the certified EIR. These impacts would not be considered substantial to human beings as they would be limited and below the level of significance.

3.19 CONCLUSION

This Addendum No. 1 to the Environmental Impact Report (EIR) was prepared for a project refinement of the County of Los Angeles Rancho Los Amigos Medical Center Plan EIR (SCH No. 91071053), certified on February 1992.¹

The purpose of the refined project is to consolidate structures to comply with a more efficient strategy for providing critical health care services within severe resource constraints. The refined project is consistent with analysis provided by the County's certified EIR. The scope of impacts from the refined project is within the scope of impacts that were analyzed in the certified EIR. The applicable mitigation measures identified in the certified EIR would continue to apply to the refined project. Based on the analysis described in this Addendum to the EIR, it is reasonable to conclude that the effects of the refined project would be negligible when compared with the approved project. Therefore, the refined project would cause no new significant environmental effects beyond those identified in the County's certified EIR.

¹ County of Los Angeles Internal Services Department. February 1992. *Rancho Los Amigos Medical Center Environmental Impact Report (SCH No. 91071053)*. Contact: Environmental Science Associates, Inc., Los Angeles, CA.

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APPENDIX A
URBEMIS 2007 MODELING RESULTS
(Approved Project)

Urbemis 2007 Version 9.2.4

Summary Report for Annual Emissions (Tons/Year)

File Name: W:\PROJECTS\1217\1217-032\Data\Air\AB 32 Analysis_North Camous Site Consolidation.urb924

Project Name: Rancho Los Amigos North Campus Site Consolidation

Project Location: South Coast AQMD

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

CONSTRUCTION EMISSION ESTIMATES

	<u>CO2</u>
2009 TOTALS (tons/year unmitigated)	4,361.33
2010 TOTALS (tons/year unmitigated)	9,915.19
2011 TOTALS (tons/year unmitigated)	9,877.13
2012 TOTALS (tons/year unmitigated)	9,509.56
2013 TOTALS (tons/year unmitigated)	3,132.20
2014 TOTALS (tons/year unmitigated)	21.34

AREA SOURCE EMISSION ESTIMATES

	<u>CO2</u>
TOTALS (tons/year, unmitigated)	475.76

OPERATIONAL (VEHICLE) EMISSION ESTIMATES

	<u>CO2</u>
TOTALS (tons/year, unmitigated)	8,386.05

SUM OF AREA SOURCE AND OPERATIONAL EMISSION ESTIMATES

	<u>CO2</u>
TOTALS (tons/year, unmitigated)	8,861.81

APPENDIX A
URBEMIS 2007 MODELING RESULTS
(Refined Project)

Urbemis 2007 Version 9.2.4

Summary Report for Annual Emissions (Tons/Year)

File Name: W:\PROJECTS\1217\1217-032\Data\Air\AB 32 Analysis_North Camous Site Consolidation.urb924

Project Name: Rancho Los Amigos North Campus Site Consolidation

Project Location: South Coast AQMD

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

CONSTRUCTION EMISSION ESTIMATES

	<u>CO2</u>
2009 TOTALS (tons/year unmitigated)	4,373.07
2010 TOTALS (tons/year unmitigated)	10,061.21
2011 TOTALS (tons/year unmitigated)	10,022.57
2012 TOTALS (tons/year unmitigated)	9,644.36
2013 TOTALS (tons/year unmitigated)	3,133.26
2014 TOTALS (tons/year unmitigated)	21.34

AREA SOURCE EMISSION ESTIMATES

	<u>CO2</u>
TOTALS (tons/year, unmitigated)	723.55

OPERATIONAL (VEHICLE) EMISSION ESTIMATES

	<u>CO2</u>
TOTALS (tons/year, unmitigated)	5,223.50

SUM OF AREA SOURCE AND OPERATIONAL EMISSION ESTIMATES

	<u>CO2</u>
TOTALS (tons/year, unmitigated)	5,947.05